09/17/2026

Jeff Watson
Sonoco Metal Packaging, LLC. - Columbus
2690 Charter St.
Columbus, OH 43228

Facility ID: 0125041920
Permit Number: P0140832
County: Franklin

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and Public Notices website, ***Weekly Review and Public Notices***. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Ohio EPA document search website here: ***eDocument Search***. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrea Moore
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA, Central District Office
50 West Town St. Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published on the Ohio EPA Weekly Review and Public Notices website, ***Weekly Review and Public Notices | Ohio Environmental Protection Agency***. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA, Central District Office at (614) 644-2270.

Sincerely,

Robert Hodanbosi

Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-CDO

Public Notice

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: ***Weekly Review and Public Notices | Ohio Environmental Protection Agency*** or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Phone: 614-644-3037 Email: ***HClerk@epa.ohio.gov***

Draft Title V Permit Renewal

Sonoco Metal Packaging, LLC. - Columbus
2690 Charter Street
Columbus, OH 43228

ID#:	P0140832
Date of Action:	09/17/2026
Permit Desc:	Renewal Title V for can coating lines, roll coating lines, can end making line and canning jar lid lines.

The permit can be accessed electronically and comments may be submitted at: https://ohioepa.commentinput.com - Search by entering the permit #P0140832 in the "Search Projects" search box.

Statement of Basis* For Air Pollution Title V Permit

*As defined in OAC rule 3745-77-01(MM): “Statement of basis” or “SOB” means a statement that sets forth the legal and factual basis for the draft [Title V] permit conditions (including references to the applicable statutory or regulatory provisions).”

Completing this form is intended to satisfy those requirements.

Facility ID:	0125041920
Facility Name:	Sonoco Metal Packaging, LLC. - Columbus
Facility Description:	Metal cans
Facility Address:	2690 Charter Street Columbus, OH 43228
Permit #:	P0140832

This facility is subject to Title V because it is major for:

☐ Lead ☐ Sulfur Dioxide ☐ Carbon Monoxide ☒ **Volatile Organic Compounds** ☐ Nitrogen Oxides

☐ Particulate Matter ≤ 10 microns ☐ Single Hazardous Air Pollutant ☐ Combined Hazardous Air Pollutants ☐ GHG

And/or subject to:

☐ Maximum Available Control Technology Standard(s) ☐ GACT standard(s) that requires a Title V permit ☐ Title IV ☐ Opt-In source

A. Permit Background

1. Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(V)?

Yes **X** No Comments:

2. Discuss any **common control determinations** (this includes revisions to previous determinations), include justification, factors, and facts which led to the final decision.

Discussion: No Changes

3. Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from **a renewal** per OAC rule 3745-77-08(E). This includes identifying conditions from previous permits that are not included in the new permit.

PTI No.: **P0125404**	Affected EUs: **K010 and K011**
Discussion of changes from the previous Title V: (P0131918) **Removal of EU's K010 and K011 from the new PTO as the units are shutdown. Additionally, <u>PTE for PM emissions</u> for EUs K001- K005 have been updated, but the requested permitted limits have not changed.**	

4. Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a **minor modification** per OAC rules 3745-77-08(C)(1) or (2)

PTI No.:	Affected EUs:

Minor Modification Description: **NA**

5. Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a **significant permit modification** per OAC rule 3745-77-08(C)(3)

PTI No.:	Affected EUs:

Significant Modification Description: **NA**

6. Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a **reopening** per OAC rule 3745-77-08(D)

PTI No.:	Affected EUs:

Reopening for Cause for Description: **NA**

7. Please identify the affected emissions unit(s) and pollutant(s) for which a **Compliance Assurance Monitoring (CAM)** Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C. Affected EUs: **NA**

8. Please identify any federal **Consent Decree (CD)** that resulted in the addition of Title V T&Cs – include the CD Number, the CD Public Notice date (if known) and Ohio EPA Permit Number (if applicable, along with final permit issuance date) that incorporates the CD requirements. **NA**
9. Please identify any **complex or unusual rule applicability determination** that is not readily apparent in the permit T&Cs and warrants additional explanation in the Statement of Basis. If the discussion is included in a PTI Permit Strategy Write Up cite the Permit Number and copy/paste or summarize the determination here.
PTI No. Discussion: **NA**

10. Please identify any **streamlining determinations** within the permit. Include an identification of the subsumed limit(s) and an explanation of how the resulting limit is equivalent to or more stringent than those subsumed. If the discussion exists in a PTI Permit Strategy Write Up, cite the Permit Number and summarize the determination here. This would also be noted for specific emissions units identified in C.
PTI No. Discussion: **NA**

11. Please identify any current **enforcement actions** to address violations at the facility resulting in a compliance plan and schedule.

Director's Final Findings and Orders; AGO Consent Decree; or U.S. EPA Consent Decree Date:	List the Order/Injunctive Relief number from the associated enforcement document and provide a description: **NA**

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.2.	31-05(D)		Federally enforceable limitations on emissions of (HAPs) 9.9 per rolling, 12-month summation for individual and 24.9 for combined HAPS for the purpose of avoiding Maximum Achievable Control Technology (MACT) regulations and Title V permitting requirements

C. Emissions Unit Terms and Conditions

Key: EU = emissions unit ID ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit) OR = operational restriction M = monitoring requirements ENF = did noncompliance issues drive the monitoring requirements?	R = record keeping requirements Rp = reporting requirements ET = emission testing requirements (not including compliance method terms) Misc = miscellaneous requirements

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
Section C.1: Emissions Unit Group - Can Coating Lines: K001, K002, K003, K004, and K005											
Can Coating Lines: K001, K002, K003, K004, K005	5.5 pounds VOC per gallon	3745-21-09(D)(2)(d)	N	N	N	Y	Y	N	N	N	Keeping monthly record of VOC content of coatings and directors notification within 45 days of any exceedances is sufficient to ensure compliance. No changes in renewal

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
Can Coating Lines: K001, K002, K003, K004, K005	32.79 tons VOC, 25.72 tons VOC, 32.45 tons VOC, 27.63 tons VOC, and 27.2 tons VOC, respectively per rolling 12-month	3745-31-05(A)(3) and PTI P0129668	N	N	N	Y	N	N	N	N	Keeping monthly and 12-month rolling records of coating and clean up usage as well as VOC content of each is sufficient to ensure compliance with these emissions limits. No changes in renewal
Section C.2: Emissions Unit Group - Roll Coaters: K007 and K008											
Roll Coaters K007 and K008	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average.	3745-17-07(A)	N	N	Y	Y	Y	N	N	N	Monitoring and keeping record of weekly VE checks along with semiannual reporting is sufficient to ensure compliance. No changes in renewal
Roll Coaters K007 and K008	(PM) from the ovens shall not exceed 0.020 pound per million Btu of actual heat input.	3745-17-10(B)(1)	N	N	N	N	N	N	N	N	Permittee only burns natural gas in the ovens. No changes in renewal

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
Roll Coaters K007 and K008	VOC emissions from all coating, thinners, and clean-up materials employed shall not exceed 15.70 tons per rolling, 12-month period from emissions unit K007 and 8.27 tons per rolling, 12-month period from emissions unit K008	3745-31-05(D)	N	Y	Y	Y	Y	N	N	N	VOC emissions from the application of coatings shall be vented to a thermal incinerator achieving an overall control efficiency of at least 98.5%.
Section C.3: Emissions Unit K009, End Line 9											
K009, End Line 9	28 tons per rolling 12-month	3745-31-05(A)(3) and PTI P0129668	N	N	Y	Y	Y	N	N	N	Monitoring, recordkeeping, and reporting is sufficient to ensure compliance. No changes in renewal
K009, End Line 9	3.7 pounds per gallon of coating	3745-21-09(D)(2)(e)	N	N	N	Y	N	N	N	N	Keeping monthly record of VOC content of coatings is sufficient to ensure compliance. No changes in renewal

DRAFT

Division of Air Pollution Control
Title V Permit

for

Sonoco Metal Packaging, LLC. - Columbus

Facility ID:	0125041920
Permit Number:	P0140832
Permit Type:	Renewal
Issued:	09/17/2026
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Sonoco Metal Packaging, LLC. - Columbus

Table of Contents

Authorization

Facility ID:	0125041920
Facility Description:	Metal cans
Application Number(s):	A0082204, A0080755
Permit Number:	P0140832
Permit Description:	Renewal Title V for can coating lines, roll coating lines, can end making line and canning jar lid lines.
Permit Type:	Renewal
Issue Date:	
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0131918

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Sonoco Metal Packaging, LLC. - Columbus
2690 Charter Street
Columbus, OH 43228

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA, Central District Office
50 West Town St. Suite 700
P.O. Box 1049
Columbus, OH 43216-1049
(614) 644-2270

The above-named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA, Central District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

John Logue
Director

List of Commonly Used Abbreviations

AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors	HVLP = high volume, low pressure	PER = Permit Evaluation Report
ASTM = American Society for Testing and Materials	LAER = lowest achievable emission rate	PM = particulate matter
BACT = Best Available Control Technology	lb(s)/hr = pound(s) per hour	PM_{10} = particulate matter with an aerodynamic diameter less than or equal to 10 microns
BAT = Best Available Technology	LDAR = leak detection and repair	$PM_{2.5}$ = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
CAA = Clean Air Act	LPG = liquefied petroleum gas/propane	ppb = parts per billion
CAM = compliance assurance monitoring	MACT = maximum achievable control technology	ppm = parts per million
CEMS = continuous emissions monitoring system	MAGLC = maximum acceptable ground level concentration	PSD = Prevention of Significant Deterioration
CFC = chlorofluorocarbon	mg/m3 = milligrams per cubic meter	psi = pounds per square inch
CFR = Code of Federal Regulations	MM = million	psia = pounds per square inch absolute
CH_4 = methane	MMBtu = million British Thermal Units	PTE = potential-to-emit
CI = compression ignition	MSDS = material safety data sheet	PTI = Permit-to-Install
CO = carbon monoxide	MSW = municipal solid waste	PTIO = Permit-to-Install and Operate
CO_2 = carbon dioxide	NAAQS = National Ambient Air Quality Standard	PTO = Permit-to-Operate
COM = continuous opacity monitor	NESHAP = National Emission Standard for Hazardous Air Pollutants	PWR = process weight rate
DAPC = Division of Air Pollution Control	NG = natural gas	RACM = reasonably available control measures
DO/LAA = District Office/Local Air Agency	ng/m3 = nanograms per cubic meter	RACT = reasonably available control technology
dscf = dry standard cubic foot	NH_3 = ammonia	RATA = relative accuracy test audit
EAC = emissions activity category	NMHC = non-methane hydrocarbons	RTO = regenerative thermal oxidizer
eDocs = electronic documents database	NMOC = non-methane organic compound	SB265 = Senate Bill 265
ERAC = Environmental Review Appeals Commission	NO = nitrogen oxide	scfm = standard cubic feet per minute
ESP = electrostatic precipitator	NO_2 = nitrogen dioxide	SI = spark ignition
EU = emissions unit	NO_x = nitrogen oxides	SIP = State Implementation Plan
FEPTIO = Federally Enforceable Permit-to-Install and Operate	NSPS = New Source Performance Standard	SO_2 = sulfur dioxide
FER = Fee Emissions Report	NSR = New Source Review	SSMP = startup, shutdown, and malfunction plan
FR = Federal Register	NTV = Non-Title V	TDS = total dissolved solids
GACT = generally achievable control technology	O&M = operation and maintenance	TLV = threshold limit value
GHG = greenhouse gases	OAC = Ohio Administrative Code	TO = thermal oxidizer
gr/dscf = grains per dry standard cubic foot	OC = organic compound	TPH = ton(s) per hour
H_2S = hydrogen sulfide	Ohio EPA = Ohio Environmental Protection Agency	TPY = ton(s) per year
H_2SO_4 = sulfuric acid	ORC = Ohio Revised Code	TSP = total suspended particulates
HAP = hazardous air pollutant	Pb = lead	VE = visible particulate emissions
HCl = hydrogen chloride	PBR = Permit-By-Rule	VMT = vehicle miles traveled
HF = hydrogen fluoride	PCB = polychlorinated biphenyl	VOC = volatile organic compound
Hg = mercury	PE = particulate emissions	WPP = work practice plan
hp = horsepower	PEMS = predictive emissions monitoring system	µg/m3 = micrograms per cubic meter

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting for State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30., Submitting Documents Required by this Permit

[Authority for term: ORC 3704.036(A)]

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

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

[Authority for term: OAC rule 3745-77-07(A)(3)(b)(i]

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 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.

[Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii]

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with

Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenance requests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

[(Authority for term: OAC rule 3745-77-07(A)(3)(c)]

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA, Central District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

[(Authority for term: OAC rule 3745-77-07(A)(3)(c)]

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.20, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

[(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b)]

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)(v)]

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA, Central District Office unless otherwise specified.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)]

3. Reporting of Any Exceedance of a Federally Enforceable Emission Limitation or Control Requirement Resulting from Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)]

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) A compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) As part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

[Authority for term: OAC rule 3745-77-07(A)(4)]

5. 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.

[Authority for term: OAC rule 3745-77-07(A)(5)]

6. 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.

[Authority for term: OAC rule 3745-77-07(A)(6)]

7. General Requirements

a) 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 reissuance, or modification, or for denial of a permit renewal application.

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 except as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. 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, reopening 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) The permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01 based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) The permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01 based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable; or

(3) A combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

[Authority for term: OAC rule 3745-77-01, OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77-07(A)(7)]

8. 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.

[Authority for term: OAC rule 3745-77-07(A)(8)]

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

[Authority for term: OAC rule 3745-77-07(A)(9)]

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

[Authority for term: OAC rule 3745-77-07(A)(10)]

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

[Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D)]

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the state, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under state law only.

[Authority for term: OAC rule 3745-77-07(B)]

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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:

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

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

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

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

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

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

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

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA, Central District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent consistent with A.13.d)(2)a. above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d)(2)a. above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

[Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L)]

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

[Authority for term: OAC rule 3745-77-07(F)]

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [defined as "Title I modification" in OAC rule 3745-77-01], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA, Central District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days' notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA, Central District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

[Authority for term: OAC rules 3745-77-07(H)(1) and (2)]

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

[Authority for term: OAC rule 3745-77-07(G)]

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as "insignificant activities and emissions levels" as defined in OAC rule 3745-77-01. Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

[Authority for term: OAC rule 3745-77-07(I)]

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

[Authority for term: OAC rule 3745-77-07(A)(1)]

20. Permit-to-Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit-to-install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

[Authority for term: OAC rule 3745-77-07(A)(1)]

21. 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.

[Authority for term: OAC rule 3745-77-07(A)(1)]

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

[Authority for term: OAC rule 3745-77-01]

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

[Authority for term: OAC rule 3745-77-01(H)(11)]

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the Ohio EPA, Central District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA, Central District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, 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.)

25. Records Retention Requirements Under State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable state air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

[Authority for term: OAC rule 3745-77-07(C)]

27. Scheduled Maintenance/Malfunction Reporting for State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA, Central District Office in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA, Central District Office must be notified in writing of any transfer of this permit.

[Authority for term: OAC rule 3745-77-01(C)]

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) Where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) Where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) Where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA, Central District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility Terms and Conditions

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

   a) None.

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

   a) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (Synthetic minor to avoid TV and MACT applicability)	See a(2)a., c)(1), d)(2), and e)(1)a. below.

      (2) Additional Terms and Conditions

         a. This permit establishes the following federally enforceable limitations on emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, for the purpose of avoiding Maximum Achievable Control Technology (MACT) regulations and Title V permitting requirements:

            i. the actual emissions from the facility, including but not limited to emissions units K001, K002, K003, K004, K005, K007, K008, K009 and all de minimis emissions units as defined in OAC rule 3745-15-05, and all registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03 and OAC rule 3745-31-30, combined, shall not exceed 9.9 tons for any single HAP, based upon a rolling, 12-month summation; and

               [Authority for term: OAC rule 3745-77-07(C)(1)]

            ii. the actual emissions from the facility, including but not limited to emissions units K001, K002, K003, K004, K005, K007, K008, K009 and all de minimis emissions units as defined in OAC rule 3745-15-05, and all registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03 and OAC rule 3745-31-30, combined, shall not exceed 24.9 tons for the total combination of all HAPs, based upon a rolling, 12-month summation.

               [Authority for term: OAC rule 3745-77-07(C)(1)]

   b) Operational Restrictions

      (1) None.

   c) Monitoring and/or Recordkeeping Requirements

      (1) The permittee shall collect and record the following information each month for the purpose of calculating the rolling, 12-month summation of HAP emissions:

a. the total emissions of each individual HAP from all de minimis emissions units as defined in OAC rule 3745-15-05, all registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03 and OAC rule 3745-31-30, in tons;

b. the total emissions of combined HAPs from all de minimis emissions units as defined in OAC rule 3745-15-05, all registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03 and OAC rule 3745-31-30, in tons;

c. the total emissions of each individual HAP from emissions units K001, K002, K003, K004, K005, K007, K008, and K009, in tons;

d. the total emissions of combined HAPs from emissions units K001, K002, K003, K004, K005, K007, K008, and K009, in tons;

e. the rolling, 12-month summation of the individual HAP emissions from all emissions units operating at the facility, in tons; and

f. the rolling, 12-month summation of the total combined HAP emissions from all emissions units operating at the facility, in tons.

A list of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting the appropriate Ohio EPA District Office or Local Air Agency (DO/LAA).

[Authority for term: OAC rule 3745-77-07(C)(1)]

d) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. any exceedance of the rolling, 12-month individual HAP emission limitation for each HAP; and

ii. any exceedance of the rolling, 12-month total combined HAPs emission limitation.

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (appropriate DO/LAA).

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), and OAC rule 3745-77-07(A)(3)(c)]

e) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations

Facility-wide emissions of any single HAP shall not exceed 9.9 tons per rolling, 12-month period.

Facility-wide emissions of total combined HAPs shall not exceed 24.9 tons per rolling, 12-month period.

Applicable Compliance Method

Compliance with the HAP emissions limitations shall be determined through the recordkeeping requirements c)(1) above.

[Authority for term: OAC rule 3745-77-07(C)(1)]

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Can Coating Lines: K001, K002, K003, K004, and K005

EU ID	Operations, Property and/or Equipment Description
K001	Can Line 1 - Side seam stripe application
K002	Can Line 2 - Side seam stripe application
K003	Can Line 3 - Side seam stripe application
K004	Can Line 4 - Side seam stripe application
K005	Can Line 5 - Side seam stripe application

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

(1) b)(1)e., d)(9) through d)(11), and e)(2)a.ii. through e)(2)a.iv.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(C)	See c)(1), c)(2), and d)(1) through d)(5) below.
b.	OAC rule 3745-21-09(D)(2)(d)	Volatile organic compound (VOC) emissions from coatings shall not exceed 5.5 pounds per gallon (lb/gal) of coating, excluding water and exempt solvents as a daily, volume-weighted average. See d)(7) below.
c.	OAC rule 3745-31-05(A)(3)	See b)(2)a. through b)(2)e. and d)(6) below.
d.	OAC rule 3745-31-05(D) (Federally Enforceable limitations to avoid 40 CFR Part 63, Subpart KKKK)	See B.2. above and d)(8) below.
e.	ORC 3704.03(F)	See d)(9) through d)(11) and e)(2)a.ii. through e)(2)a.iv. below.

(2) Additional Terms and Conditions

a. VOC emissions from all coating, thinners, and clean-up materials employed shall not exceed 32.79 tons per rolling, 12-month period from emissions unit K001.

b. VOC emissions from all coating, thinners, and clean-up materials employed shall not exceed 25.72 tons per rolling, 12-month period from emissions unit K002.

c. VOC emissions from all coating, thinners, and clean-up materials employed shall not exceed 32.45 tons per rolling, 12-month period from emissions unit K003.

d. VOC emissions from all coating, thinners, and clean-up materials employed shall not exceed 27.63 tons per rolling, 12-month period from emissions unit K004.

e. VOC emissions from all coating, thinners, and clean-up materials employed shall not exceed 27.2 tons per rolling, 12-month period from emissions unit K005.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-17-11(C)(1) and (2)(b) and OAC rule 3745-77-07(A)(1)]

(2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[Authority for term: OAC rule 3745-17-11(C)(2)(e) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA DO/LAA upon request.

[Authority for term: OAC rule 3745-17-11(C)(2)(a) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-17-11(C)(2)(c) and OAC rule 3745-77-07(C)(1)]

(3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-17-11(C)(2)(c) and OAC rule 3745-77-07(C)(1)]

(4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA DO/LAA upon request.

[Authority for term: OAC rule 3745-17-11(C)(2)(d) and (f) and OAC rule 3745-77-07(C)(1)]

(5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-17-11(C)(2)(e), (f), and (g), OAC rule 3745-17-11(C)(1) and OAC rule 3745-77-07(C)(1)]

(6) The permittee shall collect and record the following information on a monthly basis for the coating and clean-up materials applied in these emissions units for the purpose of demonstrating compliance with the VOC emissions limits established under OAC rule 3745-31-05(A)(3):

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

b. the name and identification number of each clean-up material, as applied;

c. the number of gallons of each coating, as applied;

d. the number of gallons of each clean-up material, as applied;

e. the mass of VOC per volume (VOC content), of each coating, as applied, in pounds per gallon;

f. the VOC content of each clean-up material employed, in pounds per gallon;

g. the calculated, monthly VOC emissions from all coatings, as applied, in tons;

h. the calculated, monthly VOC emissions from all clean-up materials, as applied, in tons;

i. the rolling, 12-month coating usage from each emissions unit, in tons;

j. the rolling, 12-month clean-up material usage from emissions unit, in tons;

k. the calculated rolling, 12-month summation of the total VOC emissions from each emissions unit, from all coatings, in tons;

l. the calculated rolling, 12-month summation of the total VOC emissions from each emissions unit, from all clean-up materials, in tons; and

m. if clean-up materials are collected for off-site disposal and/or recovery, the following records shall be maintained if a credit is to be applied to the monthly VOC emissions and clean-up materials usage records:

i. the amount of clean-up material recovered during the month* for off-site disposal and/or recovery, in gallons (or pounds, if records of recovered clean-up material is maintained by weight and VOC content in percent by weight);

ii. the VOC content of the recovered clean-up material shall be based on the lowest VOC content of any clean-up material collected, in pounds per gallon (or percent by weight); or it may be based upon a laboratory analysis provided by the facility to which the waste solvent is shipped;

iii. the date the recovered clean-up material was shipped, the amount shipped (minus the container), and the name and address of the receiving, disposal, and/or recovery facility;

iv. the total monthly clean-up material usage, in gallons, i.e. [d)(6)d.] – [d)(6)m.i.]; and

v. the total monthly VOC emissions from clean-up operations, in pounds, i.e., [d)(6)h.] – [d)(6)m.i. x d)(6)m.ii.].

*A daily log may be required for recovered waste clean-up solvents, where a record of the monthly total volume or weight of the collected material cannot be accurately maintained. This amount shall be adjusted if the volume or weight shipped is less than the sum of the monthly recovered solvent added to the container.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(7) The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, and K005, combined, for the purpose of complying with the VOC content limit established under OAC rule 3745-21-09(D)(2)(d) and shall maintain this information at the facility for a period of three years:

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

b. the mass of VOC per volume (VOC content) of each coating, excluding water and exempt solvents, as applied;

c. the volume of each coating, excluding water and exempt solvents, as applied; and

d. the daily, volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in OAC 3745-21-10(B)(9) for $C_{VOC,2}$.

These records are not required on days when the permittee elects to demonstrate compliance with the VOC content restriction assigned under OAC rule 3745-21-09(D)(2)(d) by means of the use of complying coatings (i.e., each coating, as applied, does not exceed 5.5 lb VOC/gal of coating, excluding water and exempt solvents). Records of the use of complying coatings shall be maintained in accordance with d)(6).

[Authority for term: OAC rule 3745-21-09(D)(2)(d) and OAC rule 3745-77-07(C)(1)]

(8) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutants (HAPs)[1] that are applied in the emissions unit:

a. the name and identification number/code of each coating, thinner, additive, clean-up material, and any other material containing any HAP;

b. the name/identification of each individual HAP contained in each material applied (and identified in d)(8)a. above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;

c. the number of gallons of each coating, thinner, additive, clean-up material, and other material applied during the month;

d. for each individual HAP, the total uncontrolled emissions from the controlled coating operations for the month, in ton(s), i.e., for each individual HAP, the summation of the products of d)(8)b. times d)(8)c. for all the coatings, thinners, additives, and other materials (not including clean-up materials) applied during the month, where the emissions are captured and introduced to the control system;

e. for each individual HAP, the total uncontrolled emissions from the clean-up materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of d)(8)b. times d)(8)c. for all the clean-up materials applied during the month;

f. the total uncontrolled combined HAPs emissions from the controlled operations for all the coatings, thinners, additives, and other materials (not including clean-up materials) applied during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from d)(8)d. above;

g. the total uncontrolled combined HAPs emissions from all the clean-up materials applied during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from d)(8)e. above;

h. for each individual HAP, the sum of (i) the calculated, controlled emission rate from all the coatings, thinners, additives, and other materials (not including clean-up materials) employed during the month, in ton(s), i.e., the total uncontrolled individual HAP emission rate calculated in d)(8)d. above, multiplied by 1 minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance, and (ii) the uncontrolled individual HAP emissions from the clean-up materials employed during the month, as calculated in d)(8)e. above;

i. for combined HAPs, the calculated total combined HAPs emission rate for all the materials employed in the controlled coating and uncontrolled clean-up operations during the month, i.e., the summation of the total emissions of each of the individual HAP emission rates calculated in d)(8)h. above;

j. for each individual HAP, the calculated total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in d)(8)h. above, for the present month plus the previous 11 months of operation, in ton(s); and

k. the calculated total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in d)(8)i. above, for the present month plus the previous 11 months of operation, in ton(s).

[1]A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and clean-up materials.

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

(9) The PTI application for emissions units K001, K002, K003, K004, and K005 was evaluated based on the actual materials and the design parameters of the emissions unit's' exhaust systems, as specified by the permittee. The *Toxic Air Contaminant Statute*, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01 using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year (TPY) using an air dispersion model such as AERSCREEN, AERMOD, ISCST3 or other Ohio EPA-approved model. The predicted one-hour

maximum ground-level concentration results from the approved air dispersion model, were compared to the maximum acceptable ground-level concentration (MAGLC), calculated as described in Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A," as follows:

a. The exposure limit, expressed as a time-weighted average concentration for a conventional eight-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units (as determined from the raw materials processed and/or coatings or other materials applied), has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. Threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices" shall be used, if the chemical is listed; or

ii. Short-term exposure limit (STEL) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent eight-hour TLV.

b. The TLV is divided by 10 to adjust the standard from the working population to the general public.

c. This standard is adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), that is, X hours per day and Y days per week, from that of eight hours per day and five days per week.

d. The resulting calculation shall be used to determine the MAGLC:

$$\frac{TLV}{10} \times \frac{8}{X} \times \frac{5}{Y} = 4\frac{TLV}{XY} = MAGLC$$

e. The following summarizes the results of dispersion modeling for the significant toxic contaminant (emitted at one TPY or more) or *worst-case* scenario:

i. Toxic Contaminant: xylene

TLV (mg/m^3): 434

Maximum Hourly Emissions Rate (lb/hr): 2.26

Predicted One-Hour Maximum Ground-Level Concentration (μg/m^3): 130.9

MAGLC (μg/m^3): 10,333

The permittee has demonstrated that emissions of xylene, from emissions units K001, K002, K003, K004, and K005 combined, are calculated to be less than 80 percent of the MAGLC; any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F).

[Authority for term: ORC 3704.03(F)(3)(c) and (F)(4), OAC rule 3745-114-01, and Option A, Engineering Guide #70]

(10) Prior to making any physical changes to or changes in the method of operation of the emissions units that could impact the parameters or values that were used in the predicted

one-hour maximum ground-level concentration, the permittee shall re-model any change to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the one-hour maximum ground-level concentration include, but are not limited to, the following:

a. Changes in the composition of the materials used or the use of new materials, that would result in the emissions of a new toxic air contaminant with a lower TLV than the lowest TLV previously modeled.

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application.

c. Physical changes to the emissions units or exhaust parameters (for example, increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines the *Toxic Air Contaminant Statute,* ORC 3704.03(F), will be satisfied for the above changes, Ohio EPA will not consider a change to be a *modification* under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the *Toxic Air Contaminant Statute, ORC 3704.03(F),* has been documented. If each change meets the definition of a *modification*, the permittee shall apply for and obtain a final PTI prior to the change. The director may consider any significant departure from the operations of the emissions unit described in the permit application as a modification that results in greater emissions than the emissions rate modeled to determine the ground-level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[Authority for term: ORC 3704.03(F)(3)(c) and (F)(4), OAC rule 3745-114-01, and Option A, Engineering Guide #70]

(11) The permittee shall collect, record and retain the following information for each toxic evaluation conducted to determine compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F):

a. A description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (for example, the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.).

b. The MAGLC for each significant toxic contaminant or worst-case contaminant, calculated per the *Toxic Air Contaminant Statute*, ORC 3704.03(F).

c. A copy of the computer model run(s), that established the predicted one-hour maximum ground-level concentration that demonstrated the emissions units to be in compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions.

d. The documentation of the initial evaluation of compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.

[Authority for term: ORC 3704.03(F)(3)(c) and (F)(4), OAC rule 3745-114-01, and Option A, Engineering Guide #70]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential-to-emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping and/or testing requirements in this permit:

i. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

ii. any exceedance of the daily limitation on toxic air emissions or any deviation from a restriction on the process or hours of operation, as established by the Director in order to maintain any toxic air contaminant below its MAGLC;

iii. any changes made, during the calendar quarter, to a parameter or value entered into the dispersion model that was used to maintain compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration; and

iv. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-77-07(A)(3)(c), ORC 3704.03(F)(3)(c) and (F)(4), OAC rule 3745-114-01, and Option A, Engineering Guide #70, and OAC rule 3745-17-11(C)]

(3) The permittee shall notify the Director (appropriate DO/LAA) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (appropriate DO/LAA) within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-21-09(D)(2)(d) and OAC rule 3745-77-07(A)(3)(c)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation

VOC content of coatings employed in this emissions unit shall not exceed 5.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method

Compliance with the VOC content limitation shall be determined through the records required in d)(7) above. Formulation data from each material's manufacturer or U.S. EPA Method 24 shall be used to determine the VOC content of the materials.

b. Emissions Limitations

VOC emissions from all coating, thinners, and clean-up materials employed shall not exceed 32.79 tons per rolling, 12-month period from emissions unit K001.

VOC emissions from all coating, thinners, and clean-up materials employed shall not exceed 25.72 tons per rolling, 12-month period from emissions unit K002.

VOC emissions from all coating, thinners, and clean-up materials employed shall not exceed 32.45 tons per rolling, 12-month period from emissions unit K003.

VOC emissions from all coating, thinners, and clean-up materials employed shall not exceed 27.63 tons per rolling, 12-month period from emissions unit K004.

VOC emissions from all coating, thinners, and clean-up materials employed shall not exceed 27.2 tons per rolling, 12-month period from emissions unit K005.

Applicable Compliance Method

Compliance with the VOC emissions limitations shall be determined through the records required in d)(6) above.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group - Roll Coaters: K007 and K008

EU ID	Operations, Property and/or Equipment Description
K007	2 metal sheet coaters in series, each with a permanent total enclosure (PTE) and each vented to its own thermal incinerator/curing oven.
K008	Metal sheet coating line with permanent total enclosure (PTE) vented to its own thermal incinerator/curing oven

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

(1) b)(1)g., (d)(11) through d)(13), and e)(3)a.vii. through e)(2)a.ix.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stacks serving these emissions units shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule. See d)(10) below.
b.	OAC rule 3745-17-10(B)(1)	Emissions of particulate matter (PM) from the ovens shall not exceed 0.020 pound per million Btu of actual heat input.
c.	OAC rule 3745-21-09(B)(6) in lieu of OAC rule 3745-21-09(U)(1)	The VOC reduction requirements established by this rule are less stringent than the VOC reduction requirements established pursuant to OAC rule 3745-31-05(D).
d.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO, NOx, PM10, PM2.5, and SO2 emissions because the potentials to emit for CO, NOx, PM10, PM2.5, and SO2 emissions are less than 10 tons per year. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from K008 because the controlled potential to emit VOC is less than

		10 tons per year taking into account the limit in OAC rule 3745-31-05(D) below. See b)(2)a. and c)(1) below.
e.	OAC rule 3745-31-05(A)(3) ORC 3704.03(T)	The BAT requirement under OAC rule 3745-31-05(A)(3) for VOC emissions from K007 is equivalent to the limit in OAC rule 3745-31-05(D) below. See b)(2)a. and c)(1) below.
f.	OAC rule 3745-31-05(D) (Federally Enforceable limitations to avoid Major Source NSR and 40 CFR Part 63, Subpart KKKK)	VOC emissions from all coating, thinners, and clean-up materials employed shall not exceed 15.70 tons per rolling, 12-month period from emissions unit K007. VOC emissions from all coating, thinners, and clean-up materials employed shall not exceed 8.27 tons per rolling, 12-month period from emissions unit K008. See B.2. above, b)(2)b., c)(2), and d)(2) through d)(9) below.
g.	ORC 3704.03(F)(4) OAC rule 3745-114-01	See d)(11) through d)(13) and e)(3)a.vii. through e)(2)a.ix. below.

(2) Additional Terms and Conditions

a. The emissions limitations associated with the natural gas combustion in the curing ovens/thermal incinerators serving these emissions units have been established to reflect the potentials to emit for each pollutant. It is not necessary to establish monitoring, recordkeeping, or reporting requirements to ensure compliance with these limitations.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

b. The permanent total enclosures (PTE) serving these emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR, Part 51, Appendix M, Reference Method 204, and shall capture all of the VOC emissions from this emissions unit.

The PTE shall be constructed to totally enclose the application stations, coating reservoirs, and all areas from the application station to the oven and the control device, such that 100% of volatile organic compound emissions are captured, contained, and directed to the control device.

The PTE shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 in. H2O), whenever the emissions units are in operation.

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(A)(1)]

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

(2) VOC emissions from the application of coatings shall be vented to a thermal incinerator achieving an overall control efficiency of at least 98.5%.

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas in the curing ovens/thermal incinerators serving these emissions units, the permittee shall maintain a record of the type and quantity of fuel burned.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(2) In order to maintain compliance with the applicable emissions limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal incinerators, for any 3-hour block of time when the emissions units controlled by the thermal incinerator are in operation, shall not be outside of the range specified by the manufacturer and/or more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions units were in compliance.

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperatures within each of the thermal incinerators when the emissions units are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions units are in operation:

a. all 3-hour blocks of time, when the emissions units controlled by the thermal incinerator was/were in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions units were in compliance; and

b. a log or record of the operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit(s).

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

(4) Whenever the monitored average combustion temperature within the thermal incinerator deviates from the range or limit established in accordance with this permit while emissions unit K007 and/or K008 is in operation, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

(5) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate DO/LAA. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

(6) The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):

a. the measured diameter of each natural draft opening;

b. the distance measured from each natural draft opening to each VOC emitting point;

c. the total calculated surface area of all natural draft openings and the surface area of the enclosure's four walls, floor, and ceiling;

d. the calculation or demonstration that the distance from each VOC emitting point to each natural draft opening is at least four (4) times the diameter of the opening; and

e. the calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than five percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling.

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

(7) The permittee shall install, operate, and maintain monitoring devices and a recorder that continuously monitors and records the differential pressure between the inside and outside of the permanent total enclosure when the emissions unit(s) is/are in operation. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

a. all three-hour blocks of time during which the difference in pressure between the permanent total enclosure and the surrounding areas is not maintained at or above the minimum pressure differential of 0.007 inches of water, as a three-hour average; and

b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

(8) The permittee shall collect and record the following information on a monthly basis for the coating and clean-up materials applied in these emissions units for the purpose of demonstrating compliance with the federally enforceable restrictions on VOC emissions:

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

b. the name and identification number of each clean-up material, as applied;

c. the number of gallons of each coating, as applied;

d. the number of gallons of each clean-up material, as applied;

e. the mass of VOC per volume (VOC content) of each coating, as applied, in pounds per gallon;

f. the VOC content of each clean-up material employed, in pounds per gallon;

g. the calculated, uncontrolled VOC emissions from all coatings, as applied;

h. the calculated, total VOC emissions from all clean-up materials, as applied;

i. the calculated, controlled VOC emissions from all coatings, as applied;

j. the calculated, controlled, rolling, 12-month summation of the total VOC emissions from coating and clean-up usage from these emissions units, in tons, using the overall control efficiency, as determined for the thermal incinerator(s) during the most recent emissions test that demonstrated that the emissions unit(s) was/were in compliance for VOC emissions from coating usage; and

k. if clean-up materials are collected for off-site disposal and/or recovery, the following records shall be maintained if a credit is to be applied to the monthly VOC emissions and clean-up materials usage records:

i. the amount of clean-up material recovered during the month* for off-site disposal and/or recovery, in gallons (or pounds, if records of recovered clean-up material is maintained by weight and VOC content in percent by weight);

ii. the VOC content of the recovered clean-up material shall be based on the lowest VOC content of any clean-up material collected, in pounds per gallon (or percent by weight); or it may be based upon a laboratory analysis provided by the facility to which the waste solvent is shipped;

iii. the date the recovered clean-up material was shipped, the amount shipped (minus the container), and the name and address of the receiving, disposal, and/or recovery facility;

iv. the total monthly clean-up material usage, in gallons, i.e. [d)(8)d.] – [d)(8)k.i.]; and

v. the total monthly VOC emissions from clean-up operations, in pounds, i.e., [d)(8)h.] – [d)(8)k.i. x d)(8)k.ii.].

A daily log may be required for recovered waste clean-up solvents, where a record of the monthly total volume or weight of the collected material cannot be accurately maintained. This amount shall be adjusted if the volume or weight shipped is less than the sum of the monthly recovered solvent added to the container.

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

(9) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutants (HAPs)[1] that are applied in the emissions unit:

a. the name and identification number/code of each coating, thinner, additive, clean-up material, and any other material containing any HAP;

b. the name/identification of each individual HAP contained in each material applied (and identified in d)(9)a. above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;

c. the number of gallons of each coating, thinner, additive, clean-up material, and other material applied during the month;

d. for each individual HAP, the total uncontrolled emissions from the controlled coating operations for the month, in ton(s), i.e., for each individual HAP, the summation of the products of d)(9)b. times d)(9)c. for all the coatings, thinners, additives, and other materials (not including clean-up materials) applied during the month, where the emissions are captured and introduced to the control system;

e. for each individual HAP, the total uncontrolled emissions from the clean-up materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of d)(9)b. times d)(9)c. for all the clean-up materials applied during the month;

f. the total uncontrolled combined HAPs emissions from the controlled operations for all the coatings, thinners, additives, and other materials (not including clean-up materials) applied during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from d)(9)d. above;

g. the total uncontrolled combined HAPs emissions from all the clean-up materials applied during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from d)(9)e. above;

h. for each individual HAP, the sum of (i) the calculated, controlled emission rate from all the coatings, thinners, additives, and other materials (not including clean-up materials) employed during the month, in ton(s), i.e., the total uncontrolled individual HAP emission rate calculated in d)(9)d. above, multiplied by 1 minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance, and (ii) the uncontrolled individual HAP emissions from the clean-up materials employed during the month, as calculated in d)(9)e. above;

i. for combined HAPs, the calculated total combined HAPs emission rate for all the materials employed in the controlled coating and uncontrolled clean-up operations during the month, i.e., the summation of the total emissions of each of the individual HAP emission rates calculated in d)(9)h. above;

j. for each individual HAP, the calculated total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in d)(9)h. above, for the present month plus the previous 11 months of operation, in ton(s); and

k. the calculated total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in d)(9)i. above, for the present month plus the previous 11 months of operation, in ton(s).

[1]A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting the appropriate DO/LAA. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and clean-up materials.

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

(10) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item d)(10)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-17-07(A) and OAC rule 3745-77-07(C)(1)]

(11) The PTI application for emissions units K007 and K008 was evaluated based on the actual materials and the design parameters of the emissions unit's' exhaust systems, as specified by the permittee. The *Toxic Air Contaminant Statute*, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01 using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year (TPY) using an air dispersion model such as AERSCREEN, AERMOD, ISCST3 or other Ohio EPA-approved model. The predicted one-hour maximum ground-level concentration results from the approved air dispersion model, were compared to the

maximum acceptable ground-level concentration (MAGLC), calculated as described in Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A," as follows:

a. The exposure limit, expressed as a time-weighted average concentration for a conventional eight-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units (as determined from the raw materials processed and/or coatings or other materials applied), has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. Threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices" shall be used, if the chemical is listed; or

   ii. Short-term exposure limit (STEL) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent eight-hour TLV.

b. The TLV is divided by 10 to adjust the standard from the working population to the general public.

c. This standard is adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), that is, X hours per day and Y days per week, from that of eight hours per day and five days per week.

d. The resulting calculation shall be used to determine the MAGLC:

$$\frac{TLV}{10} \times \frac{8}{X} \times \frac{5}{Y} = 4\frac{TLV}{XY} = MAGLC$$

e. The following summarizes the results of dispersion modeling for the significant toxic contaminant (emitted at one TPY or more) or *worst-case* scenario:

   i. Toxic Contaminant: xylene

      TLV (mg/m^3): 467

      Maximum Hourly Emissions Rate (lb/hr): 5.52

      Predicted One-Hour Maximum Ground-Level Concentration (µg/m^3): 205.47

      MAGLC (µg/m^3): 11,119

   ii. Toxic Contaminant: ethylbenzene

      TLV (mg/m^3): 93.5

      Maximum Hourly Emissions Rate (lb/hr): 1.17

      Predicted One-Hour Maximum Ground-Level Concentration (µg/m^3): 43.55

      MAGLC (µg/m^3): 2,226

   iii. Toxic Contaminant: methyl isobutyl ketone

TLV (mg/m^3): 88.2

Maximum Hourly Emissions Rate (lb/hr): 0.72

Predicted One-Hour Maximum Ground-Level Concentration (µg/m^3): 26.80

MAGLC (µg/m^3): 2,100

The permittee has demonstrated that emissions of xylene, ethyl benzene, and methyl isobutyl ketone from emissions units K007 and K008, are calculated to be less than 80 percent of the MAGLC; any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F).

[Authority for term: ORC 3704.03(F)(3)(c) and (F)(4), OAC rule 3745-114-01, and Option A, Engineering Guide #70]

(12) Prior to making any physical changes to or changes in the method of operation of the emissions units that could impact the parameters or values that were used in the predicted one-hour maximum ground-level concentration, the permittee shall re-model any change to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the one-hour maximum ground-level concentration include, but are not limited to, the following:

a. Changes in the composition of the materials used or the use of new materials, that would result in the emissions of a new toxic air contaminant with a lower TLV than the lowest TLV previously modeled.

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application.

c. Physical changes to the emissions units or exhaust parameters (for example, increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines the *Toxic Air Contaminant Statute,* ORC 3704.03(F), will be satisfied for the above changes, Ohio EPA will not consider a change to be a *modification* under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the *Toxic Air Contaminant Statute, ORC 3704.03(F),* has been documented. If each change meets the definition of a *modification*, the permittee shall apply for and obtain a final PTI prior to the change. The director may consider any significant departure from the operations of the emissions unit described in the permit application as a modification that results in greater emissions than the emissions rate modeled to determine the ground-level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[Authority for term: ORC 3704.03(F)(3)(c) and (F)(4), OAC rule 3745-114-01, and Option A, Engineering Guide #70]

(13) The permittee shall collect, record and retain the following information for each toxic evaluation conducted to determine compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F):

a. A description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (for example, the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.).

b. The MAGLC for each significant toxic contaminant or worst-case contaminant, calculated per the *Toxic Air Contaminant Statute*, ORC 3704.03(F).

c. A copy of the computer model run(s), that established the predicted one-hour maximum ground-level concentration that demonstrated the emissions units to be in compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions.

d. The documentation of the initial evaluation of compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.

[Authority for term: ORC 3704.03(F)(3)(c) and (F)(4), OAC rule 3745-114-01, and Option A, Engineering Guide #70]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

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

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential-to-emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping and/or testing requirements in this permit:

i. all 3-hour blocks of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the average combustion temperature within the thermal incinerator was outside of the range specified by the manufacturer and/or more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

ii. any records of downtime (date and length of time) for the capture (collection) system, the thermal incinerator, and/or the monitoring equipment when the emissions unit(s) was/were in operation;

iii. a log of the operating time for the capture system, thermal incinerators, monitoring equipment, and the emissions unit(s);

iv. all 3-hour blocks of time, when the emissions unit(s) was/were in operation, during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inches of water;

v. each rolling, 12-month period during which the VOC emissions from coatings and clean-up materials employed in emissions units **K007** exceeded 15.70 tons;

vi. each rolling, 12-month period during which the VOC emissions from coatings and clean-up materials employed in emissions units **K008** exceeded 8.27 tons;

vii. any exceedance of the daily limitation on toxic air emissions or any deviation from a restriction on the process or hours of operation, as established by the Director in order to maintain any toxic air contaminant below its MAGLC;

viii. any changes made, during the calendar quarter, to a parameter or value entered into the dispersion model that was used to maintain compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration; and

ix. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-77-07(A)(3)(c), ORC 3704.03(F)(3)(c) and (F)(4), OAC rule 3745-114-01, and Option A, Engineering Guide #70]

(4) The permittee shall submit semiannual written reports that identify:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA DO/LAA) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-17-07(A) and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emissions testing for these emissions units in accordance with the following requirements:

a. The emission testing shall be conducted within 5 years of the most recent compliance testing conducted on May 10, 2022.

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation of 98.5% for VOC. The overall control efficiency (in percent) shall be the vapor capture efficiency multiplied by the vapor control efficiency and divided by one hundred.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emissions rate(s):

The VOC emission rate shall be determined using Methods 1 through 5 and 25 or 25A of 40 CFR Part 60, Appendix A.

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 OAC rule 3745-21-10 or an alternative test protocol approved by the Ohio EPA. 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.

d. During the emissions testing, the emissions unit shall be operated under operational conditions approved in advance by the appropriate DO/LAA. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), and control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the emissions unit operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate DO/LAA, that the proposed operating conditions constitute "worst case". Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate DO/LAA. The "Intent to Test" notification shall describe, in detail, the proposed test methods and procedures, the emissions unit's(s') 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's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate DO/LAA, 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(s) and the testing procedures provide a valid characterization of the emissions from the emissions unit(s) and/or the performance of the control equipment.

g. 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 appropriate DO/LAA, within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate DO/LAA.

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

(2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a 6-minute average, except as specified by rule.

Applicable Compliance Method

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emissions Limitation

Emissions of VOC from curing ovens/thermal incinerator shall not exceed 8.27 tons averaged over a 12-month, rolling period for emissions unit K008.

Emissions of VOC from curing ovens/thermal incinerator shall not exceed 15.70 tons averaged over a 12-month, rolling period for emissions unit K007.

Applicable Compliance Method

Compliance with the VOC emissions limitations shall be determined through the records required in d)(8) and f(1) above.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

3. K009, End Line 9

Operations, Property and/or Equipment Description:

End line using solvent-based compound and cleaner and air-drying

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) ORC 3704.03(T)	Volatile organic compound (VOC) emissions from coatings, applied at K009, shall not exceed 28 tons per rolling 12-month period. See d)(1) below.
b.	OAC rule 3745-31-05(D) (Federally Enforceable limitation to avoid 40 CFR Part 63, Subpart KKKK)	See B.2. above and d)(4) below.
c.	OAC rule 3745-17-11(A)(1)(j)	See b)(2)a. below.
d.	OAC rule 3745-21-09(D)(2)(e)	Volatile organic compound (VOC) emissions from coatings shall not exceed 3.7 pounds per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average. See d)(2) and d)(3) below.

(2) Additional Terms and Conditions

a. This emissions unit meets the exemption in OAC rule 3745-17-11(A)(1)(j) for surface coating processes (e.g., sealers, adhesives, and deadeners) that employ airless spray and bead-type (extrusion) application methods. Therefore, this emissions unit is not subject to the requirements in OAC rule 3745-17-11(C).

[Authority for term: OAC rule 3745-17-11(A)(1)(j) and OAC rule 3745-77-07(C)(1)]

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information on a monthly basis for the coating and clean-up materials applied in this emissions unit for the purpose of demonstrating compliance with the federally enforceable restriction on VOC emissions:

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

b. the name and identification number of each clean-up material, as applied;

c. the number of gallons of each coating, as applied;

d. the number of gallons of each clean-up material, as applied;

e. the mass of VOC per volume (VOC content), of each coating, as applied, in pounds per gallon;

f. the VOC content of each clean-up material employed, in pounds per gallon;

g. the calculated, monthly VOC emissions from all coatings, as applied, in tons;

h. the calculated, monthly VOC emissions from all clean-up materials, as applied, in tons;

i. the calculated rolling, 12-month summation of the total VOC emissions from this emissions unit, in tons; and

j. if clean-up materials are collected for off-site disposal and/or recovery, the following records shall be maintained if a credit is to be applied to the monthly VOC emissions and clean-up materials usage records:

i. the amount of clean-up material recovered during the month* for off-site disposal and/or recovery, in gallons (or pounds, if records of recovered clean-up material is maintained by weight and VOC content in percent by weight);

ii. the VOC content of the recovered clean-up material shall be based on the lowest VOC content of any clean-up material collected, in pounds per gallon (or percent by weight); or it may be based upon a laboratory analysis provided by the facility to which the waste solvent is shipped;

iii. the date the recovered clean-up material was shipped, the amount shipped (minus the container), and the name and address of the receiving, disposal, and/or recovery facility;

iv. the total monthly clean-up material usage, in gallons, i.e. [d)(1)d.] – [d)(1)j.i.]; and

v. the total monthly VOC emissions from clean-up operations, in pounds, i.e., [d)(1)h.] – [d)(1)j.i. x d)(1)j.ii.].

*A daily log may be required for recovered waste clean-up solvents, where a record of the monthly total volume or weight of the collected material cannot be accurately maintained. This amount shall be adjusted if the volume or weight shipped is less than the sum of the monthly recovered solvent added to the container.

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall collect and record the following information each month for this emissions unit for the purpose of complying with the VOC content limit established under OAC rule 3745-21-09(D)(2)(e) and shall maintain this information at the facility for a period of three years:

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

b. the mass of VOC per volume (VOC content) of each coating, excluding water and exempt solvents, as applied;

c. the volume of each coating, excluding water and exempt solvents, as applied; and

d. the daily, volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in OAC 3745-21-10(B)(9) for $C_{VOC,2}$.

[Authority for term: OAC rule 3745-21-09(D)(2)(e) and OAC rule 3745-77-07(C)(1)]

(3) These records are not required on days when the permittee elects to demonstrate compliance with the VOC content restriction assigned under OAC rule 3745-21-09(D)(2)(e) by means of the use of complying coatings (i.e., each coating, as applied, does not exceed 3.7 lb VOC/gal of coating, excluding water and exempt solvents). Records of the use of complying coatings shall be maintained in accordance with d)(1).

[Authority for term: OAC rule 3745-21-09(D)(2)(e) and OAC rule 3745-77-07(C)(1)]

(4) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutants (HAPs)[1] that are applied in the emissions unit:

a. the name and identification number/code of each coating, thinner, additive, clean-up material, and any other material containing any HAP;

b. the name/identification of each individual HAP contained in each material applied (and identified in d)(4)a. above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;

c. the number of gallons of each coating, thinner, additive, clean-up material, and other material applied during the month;

d. for each individual HAP, the total uncontrolled emissions from the controlled coating operations for the month, in ton(s), i.e., for each individual HAP, the summation of the products of d)(4)b. times d)(4)c. for all the coatings, thinners, additives, and other materials (not including clean-up materials) applied during the month, where the emissions are captured and introduced to the control system;

e. for each individual HAP, the total uncontrolled emissions from the clean-up materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of d)(4)b. times d)(4)c. for all the clean-up materials applied during the month;

f. the total uncontrolled combined HAPs emissions from the controlled operations for all the coatings, thinners, additives, and other materials (not including clean-up materials) applied during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from d)(4)d. above;

g. the total uncontrolled combined HAPs emissions from all the clean-up materials applied during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from d)(4)e. above;

h. for each individual HAP, the sum of (i) the calculated, controlled emission rate from all the coatings, thinners, additives, and other materials (not including clean-up materials) employed during the month, in ton(s), i.e., the total uncontrolled individual HAP emission rate calculated in d)(4)d. above, multiplied by 1 minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance, and (ii) the uncontrolled individual HAP emissions from the clean-up materials employed during the month, as calculated in d)(4)e. above;

i. for combined HAPs, the calculated total combined HAPs emission rate for all the materials employed in the controlled coating and uncontrolled clean-up operations during the month, i.e., the summation of the total emissions of each of the individual HAP emission rates calculated in d)(4)h. above;

j. for each individual HAP, the calculated total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in d)(4)h. above, for the present month plus the previous 11 months of operation, in ton(s); and

k. the calculated total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in d)(4)i. above, for the present month plus the previous 11 months of operation, in ton(s).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting the appropriate Ohio EPA DO/LAA. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and clean-up materials.

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. any exceedance of the daily limitation on VOC emissions

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), and OAC rule 3745-77-07(A)(3)(c)]

(3) The permittee shall notify the Director (appropriate DO/LAA) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (appropriate DO/LAA) within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-21-09(D)(2)(e) and OAC rule 3745-77-07(A)(3)(c)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation

Volatile organic compound (VOC) emissions from coatings shall not exceed 28 tons per rolling 12-month period.

Applicable Compliance Method

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(1) above.

b. Emissions Limitation

VOC content of coatings employed in this emissions unit shall not exceed 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined through the records required in d)(2) above. Formulation data from each material's manufacturer or U.S. EPA Method 24 shall be used to determine the VOC content of the materials.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.