11/03/2026

Mr. Dave Holland
Duracote Corp.
350 N Diamond Street
Ravenna, OH 44266

Facility ID: 1667060088
Permit Number: P0141342
County: Portage

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.*** The permit can also be commented on and accessed electronically at: ***https://ohioepa.commentinput.com***. Search by entering the permit # (P0141342) in the "Search Projects" search box and selecting “Review Document” or “Draft Permit.” Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Written (paper) 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

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313

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 Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,



Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 - *Via E-Mail Notification*
ARAQMD; Pennsylvania; West Virginia

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

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

ID#:	P0141342
Date of Action:	11/03/2026
Permit Desc:	Title V renewal permit for manufacturer of coated and laminated vinyl and fabric substrate products.

The permit can be accessed electronically and comments may be submitted at: https://ohioepa.commentinput.com - Search by entering the permit P0141342 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:	1667060088
Facility Name:	Duracote Corp.
Facility Description:	Coated Fabrics, Not Rubberized.
Facility Address:	350 North Diamond Street Ravenna, OH 44266-1209
Permit #:	P0141342

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: **N/A**

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.: **N/A**	Affected EUs: **N/A**
Discussion of changes from the previous Title V: **N/A**	
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.: **N/A**	Affected EUs: **N/A**
Minor Modification Description: **N/A**	
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.: **N/A**	Affected EUs: **N/A**
Significant Modification Description: **N/A**	

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.: **N/A**	Affected EUs: **N/A**

Reopening for Cause for Description: **N/A**

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: **N/A**

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.

CD No. **N/A**	Public Notice Date: **N/A**	PTI No. **N/A**	PTI Issuance Date: **N/A**

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. **N/A**	Discussion: **N/A**

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. **N/A** Discussion: **N/A**

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: **N/A**	List the Order/Injunctive Relief number from the associated enforcement document and provide a description: **N/A**

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.2. through B.5.	31-05(D)	N	Facility-wide 249 tpy VOC emission limitation to avoid major NSR.

B.6.	N	Y	Emissions units K002, K005 and K006 are subject to 40 CFR Part 63, Subpart 0000.
B.7.	N	Y	Emissions unit P001 is subject to 40 CFR Part 63, Subpart WWWW.
B.8.	77-07(A)(13)	N	Emissions units B002 and B003 are insignificant units subject to one or more applicable requirements.
B.9.	N	Y	Emissions units B002 and B003 are subject to 40 CFR Part 63, Subpart DDDDD.

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: K002, K005, Coating Lines											
K002 K005	28.32 tons VOC per month averaged over a 12-month rolling period	31-05(A)(3)	N	N	Y	Y	Y	N	N	N	ET: Compliance based on monthly emission calculations/record keeping.
K002 K005	6.3 lbs VOC per gallon of coating, excluding water and exempt solvents	21-19(D)(1)(b)	N	Y	Y	Y	Y	N	N	N	OR: Cleaning solvent restrictions as required per rule. ET: Compliance based on monthly emission calculations/record keeping.
K002 K005	2.9 lbs VOC per gallon of coating, excluding	21-09(G)	N	N	Y	Y	Y	N	N	N	ET: Compliance based on monthly emission calculations/record keeping.

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	water and exempt solvents										
K002 K005	4.8 lbs VOC per gallon of coating, excluding water and exempt solvents	21-09(H)(1)(a)	N	N	Y	Y	Y	N	N	N	ET: Compliance based on monthly emission calculations/record keeping.
K002 K005	0.12 kg of organic HAP per kg of solids applied, calculated as a rolling 12-month average	40 CFR Part 63 Subpart OOOO	Y	N	Y	Y	Y	N	N	N	ND: No operating limits or work practice standards for emission rate without add-on controls compliance option. ET: Compliance based on monthly emission calculations/record keeping.

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
Section C.2: K006, Laminator #3											
K006	4.8 lbs VOC per gallon of coating, excluding water and exempt solvents	21-09(H)(1)(a)	N	N	Y	Y	Y	N	N	N	ET: Compliance based on monthly emission calculations/record keeping.
K006	2.9 lbs VOC per gallon of coating, excluding water and exempt solvents	21-09(G)	N	N	Y	Y	Y	N	N	N	ET: Compliance based on monthly emission calculations/record keeping.
K006	0.12 kg of organic HAP per kg of solids applied,	40 CFR Part 63	Y	N	Y	Y	Y	N	N	N	ND: No operating limits or work practice standards for emission rate without add-on controls compliance option. ET: Compliance based on monthly emission calculations/record keeping.

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	calculated as a rolling 12-month average	Subpart OOOO									
Section C.3: P001, UV-1											
P001	3.94 tons VOC per month averaged over a 12-month rolling period	31-05(A)(3)	N	N	Y	Y	Y	N	N	N	ET: Compliance based on monthly emission calculations/record keeping.
P001	113 lbs VOC per ton of resin applied based on a 12-month	21-25(D)(1) and (2)	N	Y	Y	Y	Y	N	N	N	OR: Cleaning solvent restrictions as required per rule. ET: Compliance based on monthly emission calculations/record keeping.

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	rolling average										
P001	113 lbs organic HAP per ton of resin applied based on a 12-month rolling average	40 CFR Part 63 Subpart WWWW	N	N	Y	Y	Y	N	N	N	ET: Compliance based on monthly emission calculations/record keeping.

Ohio Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Title V Permit

for

Duracote Corp.

Facility ID:	1667060088
Permit Number:	P0141342
Permit Type:	Renewal
Issued:	11/03/2026
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Duracote Corp.

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Authorization

Facility ID:	1667060088
Facility Description:	Coated Fabrics, Not Rubberized.
Application Number(s):	A0082178
Permit Number:	P0141342
Permit Description:	Title V renewal permit for manufacturer of coated and laminated vinyl and fabric substrate products.
Permit Type:	Renewal
Issue Date:	
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0131290

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

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

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

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

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 Akron Regional Air Quality Management District. 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 Akron Regional Air Quality Management District. 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall

be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

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

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

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 Akron Regional Air Quality Management District) 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (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 Akron Regional Air Quality Management District. 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District, 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 Wide Terms and Conditions

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

a) None.

2. Applicable Emissions Limitations and/or Control Requirements.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(D) (To avoid Major New Source Review)	Volatile organic compound (VOC) emissions from coatings and cleanup materials at this facility shall not exceed 249 tons per rolling, 12-month period. See 2.a) and 2.b) below.

a) The annual VOC emission rate is equivalent to the annual VOC material usage rate, and is based upon 100% solvent emitted from the materials employed.

b) This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the monthly VOC emission rates, upon final issuance of this permit.

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

3. The permittee shall collect and record the following information each month for this facility to determine the total VOC emissions:

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

b) the weight (pounds) of each coating, as applied;

c) the weight (pounds) of each cleanup material, as applied;

d) the VOC content (percent by weight) of each coating, as applied;

e) the VOC content (percent by weight) of each cleanup material, as applied;

f) the total VOC emissions (pounds) from all coatings, as applied, i.e., f = sum[b x d] for all coatings;

g) the total VOC emissions (pounds) from all cleanup materials, i.e., g = sum[c x e] for all cleanup materials, excluding cleanup material recovered;

h) the total VOC emissions (tons) from all coatings and cleanup materials, as applied, i.e., h = [f + g]/2000; and

i) the rolling, 12-month total VOC emissions (tons) from all coatings and cleanup materials, as applied, i.e., the sum of h for the current calendar month and the previous eleven calendar months.

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

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

a) any month the facility-wide VOC emissions from coatings and cleanup materials exceed 249 tons per rolling, 12-month period.

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 3745-77-07(A)(3)]

5. Compliance with the emission limitations in B.2. of these terms and conditions shall be determined in accordance with the following methods:

a) Emissions Limitation:

VOC emissions from coatings and cleanup materials at this facility shall not exceed 249 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the facility-wide rolling 12-month VOC emission limitation identified above shall be demonstrated by the record keeping requirements specified in B.3 of this permit.

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

6. The following significant emissions units contained in this permit are subject to 40 CFR Part 63, Subpart OOOO, National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles: K002, K005 and K006. The complete Maximum Achievable Control Technology (MACT) requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website ***http://www.ecfr.gov*** or by contacting the appropriate Ohio EPA District Office or Local Air Agency.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart OOOO]

7. The following significant emissions unit contained in this permit is subject to 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production: P001. The complete Maximum Achievable Control Technology (MACT) requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website ***http://www.ecfr.gov*** or by contacting the appropriate Ohio EPA District Office or Local Air Agency.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart WWWW]

8. The following insignificant emissions units at this facility must comply with all applicable state and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63:

B002, 4.185 MMBtu/hr Natural Gas-Fired Cleaver Brooks Boiler

B003, 4.185 MMBtu/hr Natural Gas-Fired Cleaver Brooks Boiler

[Authority for term: OAC rule 3745-77-07(A)(13)]

9. The following insignificant emissions units contained in this permit are subject to 40 CFR Part 63 Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters: B002 and B003. The complete Maximum Achievable Control Technology (MACT) requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website ***http://www.ecfr.gov*** or by contacting the appropriate Ohio EPA District Office or Local Air Agency.

   The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart DDDDD, including the following sections:

§63.7495(b)	Compliance date for existing boilers: January 31, 2016
§63.7495(d)	Notification requirements schedule
§63.7499(l)	Units designed to burn gas 1 fuels subcategory
§63.7500(a)(1) and Table 3	Work Practice Standards: tune-up once every 5 years for natural gas boilers with a heat input capacity less than or equal to 5 MMBtu/hr
§63.7500(a)(3)	Operate and maintain the boilers at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions
§63.7500(e)	Not subject to the emission limits in Tables 1 and 2 or 11 through 13, or the operating limits in Table 4
§63.7505(a)	General compliance requirements
§63.7510(e)	An initial tune-up and one-time energy assessment completed no later than January 31, 2016
§63.7515(d)	Each 5-year performance tune-up conducted no more than 61 months after the previous tune-up
§63.7515(g)	Subsequent tune-ups for units not operating at the time of scheduled tune-up completed within 30 calendar days of startup
§63.7530(e) and (f)	Initial compliance demonstration for work practice standards
§63.7540(a)(12) and (13)	Continuous compliance demonstration for work practice standards
§63.7545(a), (b) and (e)	Notification of compliance status
§63.7545(f)	Notification of alternative fuel use for curtailment or supply interruption
§63.7545(h)	Notification of fuel switch or physical change to different subcategory
§63.7550(a) through (c) and Table 9	Reporting Requirements: Compliance report submitted every 5 years

§63.7550(h)(3)	Electronic reporting procedures
§63.7555(a)(1) and (2)	Records of notifications, reports and compliance demonstrations
§63.7555(h)	Records of alternative fuel use and operation during gas curtailment or supply emergencies
§63.7560(a) through (c)	Record keeping format and retention
§63.7565 and Table 10	Applicable General Provisions
§63.7570	Implementation and enforcement
§63.7575	Definitions

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart DDDDD]

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Coating Lines: K002, K005

EU ID	Operations, Property and/or Equipment Description
K002	Horizontal Coater #2 - Coating line and three natural gas-fired ovens (125,000 Btu/hr each) with coating head for coating plastisols, organisols, and various polymer coatings to vinyl.
K005	Laminator #1 - Coating line (air dried) for lamination of various films to fabrics and other substrates.

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) (PTI P0120881, issued 1/26/2017)	The Best Available Technology (BAT) requirements under this rule are equivalent to the volatile organic compound (VOC) requirements established by OAC rule 3745-21-09 for fabric and vinyl coating lines. The VOC emissions from aerospace manufacturing coating materials and cleaning solvents, combined, shall not exceed 28.32 tons per month averaged over a 12-month rolling period.
b.	OAC rule 3745-21-09(G)	The VOC content of coatings employed for fabric shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
c.	OAC rule 3745-21-09(H)(1)(a)	The VOC content of coatings employed for vinyl shall not exceed 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
d.	OAC rule 3745-21-19(D)(1)(b)	The VOC content of commercial interior adhesive coatings employed for aerospace manufacturing shall not exceed 6.3 pounds

		of VOC per gallon of coating, excluding water and exempt solvents, as applied. See c)(1) and c)(2) below.
e.	40 CFR Part 63, Subpart OOOO (40 CFR 63.4280 - 63.4371) [In accordance with 40 CFR 63.4281(a) and (b), emissions units K002, and K005 are existing coating lines for fabric and other textiles that are part of a major source of hazardous air pollutant (HAP) emissions and subject to the requirements specified by this section.]	Limit organic HAP emissions to no more than 0.12 kilogram (kg) of organic HAP per kg of solids applied, calculated as a rolling 12-month average emission rate. [40 CFR 63.4290 and Table 1 to Subpart OOOO of Part 63] See b)(2)a. below.
f.	40 CFR Part 63, Subpart A (40 CFR 63.1 - 63.16)	General Provisions. See b)(2)a. below.

(2) Additional Terms and Conditions

a. The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart OOOO, including the following sections:

§63.4282(a) and (b)	Parts of an affected source
§63.4282(g)	Existing sources constructed prior to July 11, 2002
§63.4283(b)	Compliance date for existing source: May 29, 2006
§63.4290 and Table 1	Organic HAP emission limit for existing coating affected sources
§63.4291(a)(2)	Emission rate without add-on controls compliance option
§63.4292(a)	No operating limits for selected compliance option
§63.4293(a)	No work practice standards for selected compliance option
§63.4300(a)(2) and (b)	General compliance requirements
§63.4301 and Table 3	Applicable General Provisions
§63.4370	Implementation and enforcement
§63.4371	Definitions

c) Operational Restrictions

(1) Except as otherwise provided in OAC rule 3745-21-19(E)(1)(b), any cleaning solvent employed in a hand wipe cleaning operation shall meet one of the following specifications:

a. meet the definition of an aqueous cleaning solvent; or

b. have a VOC composite vapor pressure of 7.0 millimeters of mercury (3.75 inches of water) or less at 20 degrees Celsius (68 degrees Fahrenheit).

[Authority for term: OAC rule 3745-21-19(E)(1) and OAC rule 3745-77-07(A)(1)]

(2) The permittee shall implement the following housekeeping measures for cleaning solvents and solvent-laden cleaning materials used in cleaning operations:

a. except for semiaqueous cleaning solvents and where excluded under OAC rule 3745-21-19(E)(4)(d), all fresh and spent cleaning solvents shall be stored in nonabsorbent, nonleaking containers that are kept closed at all times except when filling or emptying;

b. except where excluded under OAC rule 3745-21-19(E)(4)(d), all used solvent-laden cloths and papers, and any other absorbent applicators used for cleaning, shall be placed in nonabsorbent, nonleaking containers or bags that are kept closed at all times except when depositing or removing these materials from the container or bag; and

c. except where excluded under OAC rule 3745-21-19(E)(4)(d), the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents shall be conducted in such a manner that minimizes spills.

[Authority for term: OAC rule 3745-21-19(E)(4) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following daily information for each fabric or vinyl coating line:

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

b. the mass of VOC per volume 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 rule 3745-21-10(B)(9) for $C_{VOC,2}$.

[Authority for term: OAC rule 3745-21-09(B)(3) and OAC rule 3745-77-07(A)(3)]

(2) The permittee shall maintain the following records for aerospace manufacturing:

a. Compliance demonstration records for each coating in use at the facility:

i. the name and VOC content as received and as applied;

ii. the type of coating, as identified OAC rule 3745-21-19(D)(1)(a) and (b);

iii. all data, calculations, and test results (including USEPA method 24 results) used in determining the VOC content, expressed in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied; and

iv. the amount (gallons) of each coating used each month at the facility.

b. Compliance demonstration records for cleaning operations:

i. the name, vapor pressure (i.e., VOC composite vapor pressure), and documentation showing the composition of each cleaning solvent used;

ii. a listing of cleaning operations in which each cleaning solvent is used;

iii. for each cleaning solvent used in hand wipe cleaning operations that complies the requirements of OAC rule 3745-21-19(E)(1)(a), the following:

(a) the name of each cleaning solvent used;

(b) all data and calculations that demonstrate the cleaning solvent complies with either the water composition requirement or VOC composite vapor pressure requirement;

(c) the amount (gallons) of each cleaning solvent used each year, as determined from facility purchase or usage records;

iv. for each cleaning solvent used in hand wipe cleaning operations that is exempted under OAC rule 3745-21-19(E)(1)(b), the following:

(a) the name of each cleaning solvent used;

(b) a list of the exempted hand wipe cleaning operations in which each cleaning solvent is used; and

(c) the amount (gallons) of each cleaning solvent used each year, as determined from facility purchase or usage records.

[Authority for term: OAC rule 3745-21-19(J) and OAC rule 3745-77-07(A)(3)]

(3) The permittee shall calculate and record the monthly VOC emissions from aerospace manufacturing coating materials and cleaning solvents, combined, in tons per month averaged over a 12-month rolling period.

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

(4) The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart OOOO, including the following sections:

§63.4312(a) through (f) and (i)	Required records
§63.4313(a) through (c)	Record keeping format and retention
§63.4330 and §63.4331(a)	Initial compliance demonstration
§63.4332(a) through (d)	Continuous compliance demonstration

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)]

(2) The permittee shall notify the Director (appropriate District Office or Local Air Agency) of any record showing that the daily volume-weighted average VOC content exceeds the applicable fabric or vinyl coating emission limitation. A copy of such record shall be sent to the Director (appropriate District Office or Local Air Agency) within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-21-09(B)(3) and OAC rule 3745-77-07(A)(3)]

(3) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of these emissions units:

a. each month the VOC emissions from aerospace manufacturing coating materials and cleaning solvents, combined, exceeded 28.32 tons per month averaged over a 12-month rolling period.

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

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

(4) The permittee shall perform the following reporting requirements for aerospace manufacturing:

a. The permittee shall submit an initial compliance status report within 60 calendar days after initial startup which includes:

i. the type of coating and the VOC content limit for the coating;

ii. a statement that only coatings meeting the applicable VOC content limit are to be employed, unless otherwise controlled pursuant to OAC rule 3745-21-19(D)(2) or exempted pursuant to OAC rule 3745-21-19(D)(3);

iii. a description of the types of cleaning operations;

iv. a listing of the cleaning solvents being employed in each cleaning operation; and

v. a statement that all cleaning operations are to comply with the applicable requirements under OAC rule 3745-21-19(E).

b. The permittee shall submit semiannual compliance status reports no later than 30 calendar days after the end of each 6-month period to the appropriate Ohio EPA District Office or Local Air Agency. The first report shall be submitted no later than 30 calendar days after the end of the first 6-month period following the compliance date. Subsequent reports shall be submitted no later than 30 calendar days after the end of each 6-month period following the first report or no later than 30 calendar days after the end of each 6-month period otherwise established within a permit issued for the facility.

For each semiannual compliance status report, the permittee shall include the following information for the 6-month period covered by the report:

i. any changes to the previous reporting of the types of coatings and the VOC content limits for the coatings;

ii. any changes to the previous reporting of the description of the types of cleaning operations and the listing of the cleaning solvents employed in each cleaning operation;

iii. certification that that only coatings which comply with the applicable VOC content limit have been used each operating day in the semiannual reporting period, or identification of the periods of use of coatings that did not comply, the reasons for such use of noncompliant coatings, and the amounts and VOC contents of each such noncompliant coating used;

iv. certification that cleaning operations have been in compliance, or identification of any instances of noncompliance, with the applicable requirements under OAC rule 3745-21-19(E);

v. identification and description of the corrective actions considered and implemented for any noncompliance reported in the compliance certification; and

vi. the signature of the responsible official for the facility.

[Authority for term: OAC rule 3745-21-19(K) and OAC rule 3745-77-07(A)(3)]

(5) The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart OOOO, including the following sections:

§63.4283(d)	Notifications required prior to compliance date
§63.4310(a), (b), (c)(1) through (c)(8)	Initial notification and notification of compliance status

§63.4311(a)(1) through (a)(4) and (a)(6)	Semiannual compliance reports

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 Limitations:

The VOC content of coatings employed for fabric shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

The VOC content of coatings employed for vinyl shall not exceed 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation identified above shall be demonstrated by the record keeping specified in section d)(1) of this permit.

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

b. Emissions Limitation:

The VOC content of coatings employed for aerospace components shall not exceed 6.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation identified above shall be demonstrated by the record keeping specified in section d)(2) of this permit.

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

c. Emissions Limitation:

The VOC emissions from aerospace manufacturing coating materials and cleaning solvents, combined, shall not exceed 28.32 tons per month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation identified above shall be demonstrated by the record keeping specified in section d)(3) of this permit.

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

d. Emissions Limitation:

Limit organic HAP emissions to no more than 0.12 kg of organic HAP per kg of solids applied, calculated as a rolling 12-month average emission rate.

Applicable Compliance Method:

Compliance with the allowable HAP emission limitation identified above shall be demonstrated in accordance with 40 CFR Part 63, Subpart OOOO as specified in section d)(4) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart OOOO]

(2) U.S. EPA Method 24 shall be used to demonstrate compliance with any applicable VOC content limitation specified in rule 3745-21-09 of the Administrative Code. If, pursuant to section 11.4 of U.S. EPA Method 24, as contained in 40 CFR Part 60 appendix A, an owner or operator determines that U.S. EPA Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for U.S. EPA Method 24.

U.S. EPA Method 24 or formulation data shall be used to determine the VOC content of the cleanup materials.

[Authority for term: OAC rule 3745-21-04(B)(5) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

2. K006, Laminator #3

Operations, Property and/or Equipment Description:

Roll coating application of adhesive and top coat to vinyl and fabric laminate substrates, organic solvents flashed off with indirect heat transfer drying oven. No add-on emission controls employed.

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) (PTI P0121909, issued 12/30/2016)	The Best Available Technology (BAT) requirements under this rule are equivalent to the volatile organic compound (VOC) requirements established by OAC rule 3745-21-09 for fabric and vinyl coating lines.
b.	OAC rule 3745-21-09(G)	The VOC content of coatings employed for fabric shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
c.	OAC rule 3745-21-09(H)(1)(a)	The VOC content of coatings employed for vinyl shall not exceed 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
d.	40 CFR Part 63, Subpart OOOO (40 CFR 63.4280 - 63.4371) [In accordance with 40 CFR 63.4281(a) and (b), emissions unit K006 is an existing coating line for fabric and other textiles that is part of a major source of hazardous air pollutant (HAP) emissions and subject to the requirements specified by this section.]	Limit organic HAP emissions to no more than 0.12 kilogram (kg) of organic HAP per kg of solids applied, calculated as a rolling 12-month average emission rate. [40 CFR 63.4290 and Table 1 to Subpart OOOO of Part 63] See b)(2)a. below.
e.	40 CFR Part 63, Subpart A (40 CFR 63.1 - 63.16)	General Provisions. See b)(2)a. below.

(2) Additional Terms and Conditions

a. The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart OOOO, including the following sections:

§63.4282(a) and (b)	Parts of an affected source
§63.4282(g)	Existing sources constructed prior to July 11, 2002
§63.4283(b)	Compliance date for existing source: May 29, 2006
§63.4290 and Table 1	Organic HAP emission limit for existing coating affected sources
§63.4291(a)(2)	Emission rate without add-on controls compliance option
§63.4292(a)	No operating limits for selected compliance option
§63.4293(a)	No work practice standards for selected compliance option
§63.4300(a)(2) and (b)	General compliance requirements
§63.4301 and Table 3	Applicable General Provisions
§63.4370	Implementation and enforcement
§63.4371	Definitions

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following daily information for this coating line:

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

b. the mass of VOC per volume 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 rule 3745-21-10(B)(9) for $C_{VOC,2}$.

[Authority for term: OAC rule 3745-21-09(B)(3) and OAC rule 3745-77-07(A)(3)]

(2) The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart OOOO, including the following sections:

§63.4312(a) through (f) and (i)	Required records
§63.4313(a) through (c)	Record keeping format and retention
§63.4330 and §63.4331(a)	Initial compliance demonstration
§63.4332(a) through (d)	Continuous compliance demonstration

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director (appropriate Ohio EPA District Office or Local Air Agency), 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)]

(2) The permittee shall notify the appropriate Ohio EPA District Office or Local Air Agency of any record showing that the daily volume-weighted average VOC content exceeds the applicable fabric or vinyl coating emission limitation. A copy of such record shall be sent to the appropriate Ohio EPA District Office or Local Air Agency within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-21-09(B)(3) and OAC rule 3745-77-07(A)(3)]

(3) The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart OOOO, including the following sections:

§63.4283(d)	Notifications required prior to compliance date
§63.4310(a), (b), (c)(1) through (c)(8)	Initial notification and notification of compliance status
§63.4311(a)(1) through (a)(4) and (a)(6)	Semiannual compliance reports

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. <u>Emissions Limitation</u>

The VOC content of coatings employed for fabric shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

The VOC content of coatings employed for vinyl shall not exceed 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

<u>Applicable Compliance Method</u>

Compliance with the allowable VOC content limitation identified above shall be demonstrated by the record keeping requirements specified in section d)(1) of this permit.

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

b. Emissions Limitation:

Limit organic HAP emissions to no more than 0.12 kg of organic HAP per kg of solids applied, calculated as a rolling 12-month average emission rate.

Applicable Compliance Method:

Compliance with the HAP emission limitation identified above shall be demonstrated in accordance with 40 CFR Part 63, Subpart OOOO as specified in section d)(3) of this permit.

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

(2) U.S. EPA Method 24 shall be used to demonstrate compliance with any applicable VOC content limitation specified in rule 3745-21-09 of the Administrative Code. If, pursuant to section 11.4 of U.S. EPA Method 24, as contained in 40 CFR Part 60 appendix A, an owner or operator determines that U.S. EPA Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for U.S. EPA Method 24.

U.S. EPA Method 24 or formulation data shall be used to determine the VOC content of the cleanup materials.

[Authority for term: OAC rule 3745-21-04(B)(5) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

3. P001, UV-1

Operations, Property and/or Equipment Description:

Polymer film casting operation. Process consists of applying a styrene-based epoxy vinyl ester film to paper mold using a rotogravure roller (open molding operation with corrosion resistant and/or high strength (CR/HS) and mechanical resin application method) and UV curing oven to polymerize the compound. No add-on emission controls employed.

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) (PTI P0121908, issued 12/30/2016)	Volatile organic compound (VOC) emissions shall not exceed 3.94 tons per month averaged over a 12-month rolling period.
b.	OAC rule 3745-21-25(D)(1) and (2)	VOC emissions shall not exceed 113 pounds per ton (lb/ton) of resin applied based on a 12-month rolling average. See b)(2)a., b)(2)b., c)(1) and c)(2) below.
c.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935) [In accordance with 40 CFR 63.5785(a) emissions unit P001 is a reinforced plastic composites production facility that is located at a major source of hazardous air pollutant (HAP) emissions and subject to the requirements specified by this section.]	Organic HAP emissions shall not exceed 113 lb/ton based on a 12-month rolling average. [40 CFR 63.5805(c) and Table 3 to Subpart WWWW of Part 63] See b)(2)c. below.
d.	40 CFR Part 63, Subpart A (40 CFR 63.1 - 63.16)	General Provisions. See b)(2)a. below.

(2) Additional Terms and Conditions

a. The VOC emissions from all open molding operations at this facility, as calculated in accordance with OAC rule 3745-21-25(F), are less than 100 tons per year. In the event the facility subsequently equals or exceeds the 100 tons of VOC per year threshold, then the facility becomes subject to the requirements of OAC rule 3745-21-25(D)(3). The compliance date of any affected operation pertaining to a new VOC emission requirement is two years from the date that the semiannual compliance report indicates the facility meets or exceeds the threshold of 100 tons of VOC per year.

[Authority for term: OAC rule 3745-21-25(D)(6), OAC rule 3745-21-25(R)(2) and OAC rule 3745-77-07(A)(1)]

b. The permittee shall meet the applicable VOC emission limit and work practice standards at all times, including periods or startup, shutdown or malfunction.

[Authority for term: OAC rule 3745-21-25(O)(1)(c) and OAC rule 3745-77-07(A)(1)]

c. The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart WWWW, including the following sections:

§63.5790(a) through (c)	Affected sources and excluded operations
§63.5795(a)	New affected sources
§63.5796 and Table 1	Organic HAP emission factors
§63.5797(a) through (c)	Organic HAP content of resins and gel coats
§63.5798(a) and (b)	Emission factors for application technology not represented in Table 1
§63.5799(a) and (b)	Calculation of organic HAP tpy emissions for §63.5805 applicability
§63.5800 and Table 2	Compliance for new major source upon startup date
§63.5805(c) and Table 3	Organic HAP emission limit for open molding operations
§63.5805(c) and Table 4	Work practice standards for cleaning and HAP-containing material storage operations
§63.5805(e) and (f)	Exceedance of 100 tpy HAP threshold
§63.5810(a) through (d)	Options for meeting open molding standards
§63.5835(a) and (c)	General compliance requirements
§63.5925 and Table 15	Applicable General Provisions
§63.5930	Implementation and enforcement
§63.5935	Definitions

c) Operational Restrictions

(1) The permittee shall not use cleaning solvents (cleaners) that have a VOC content greater than 0.42-pound VOC per gallon in this emissions unit, except cleaners used in closed systems and used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.

[Authority for term: OAC rule 3745-21-25(D)(1) and OAC rule 3745-77-07(A)(1)]

(2) The permittee shall keep containers that store VOC-containing materials closed or covered except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety.

[Authority for term: OAC rule 3745-21-25(D)(1) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall calculate and record the monthly VOC emissions from this emissions unit in tons per month averaged over a 12-month rolling period.

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

(2) After the initial compliance date, the permittee shall calculate the facility's VOC emission threshold over the 12-month period ending June 30th or December 31st, whichever date is the first date following the compliance date specified in OAC rule 3745-21-25(R). Subsequent calculations should cover the periods in the semiannual compliance reports.

[Authority for term: OAC rule 3745-21-25(F)(5) and OAC rule 3745-77-07(A)(3)]

(3) The permittee shall use one of the methods in OAC rule 3745-21-25(G)(1) to (G)(4) to meet the applicable VOC emissions limits for open molding operations. The necessary calculations shall be completed within 30 days after the end of each month. The permittee may switch between the compliance options in OAC rule 3745-21-25(G)(1) to (G)(4). When the permittee changes to an option based on a 12-month rolling average, the permittee shall base the average on the previous 12 months of data calculated using the compliance option the permittee is changing to, unless the permittee was previously using an option that did not require the permittee to maintain records of resin and gel coat use. In this case, the permittee shall immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

[Authority for term: OAC rule 3745-21-25(G) and OAC rule 3745-77-07(A)(3)]

(4) For meeting any VOC emission limitations based on a VOC emission limitation specified in Table 2 of OAC rule 3745-21-25, the permittee shall collect and keep records of resin and gel coat use, monomer content, and operation where the resin is used. Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The monomer content records may be based on MSDS or on resin specifications supplied by the resin supplier.

[Authority for term: OAC rule 3745-21-25(O)(2)(b) and OAC rule 3745-77-07(A)(3)]

(5) Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission limit as defined in OAC rule 3745-21-25(G)(1). However, the permittee shall retain the records of resin and gel coat monomer content, and the permittee shall include the list of these resins and gel coats and identify their application methods in the semiannual compliance reports. If after the permittee has initially demonstrated that a specific combination of an individual resin or gel coat, application method, and controls meets an applicable emission limit, and the resin or gel coat changes or the monomer content increases, or the permittee changes the application method or controls, then the permittee again shall demonstrate that the individual resin or gel coat meets its emission limit as specified in OAC rule 3745-21-25(G)(1). If any of the previously mentioned changes results in a situation where an individual resin or gel coat exceeds its applicable emission limit in Table 2 of this rule, the permittee shall begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a 12-month rolling average.

[Authority for term: OAC rule 3745-21-25(O)(2)(c) and OAC rule 3745-77-07(A)(3)]

(6) The permittee shall keep a copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status.

[Authority for term: OAC rule 3745-21-25(P)(1)(a) and OAC rule 3745-77-07(A)(3)]

(7) For operations listed in Table 2 of OAC rule 3745-21-25, the permittee shall keep all data, assumptions, and calculations used to determine monomer contents and VOC emissions factors.

[Authority for term: OAC rule 3745-21-25(P)(1)(c) and OAC rule 3745-77-07(A)(3)]

(8) The permittee shall keep a certified statement that cleaning and VOC-containing material storage operations are in compliance with the work practice standards specified in sections c)(1) and c)(2) of this permit.

[Authority for term: OAC rule 3745-21-25(P)(1)(e) and OAC rule 3745-77-07(A)(3)]

(9) All records specified in d)(6), d)(7) and d)(8) above shall be retained by the permittee for a period of not less than five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record and shall be made available to the director or any authorized representative of the director for review during normal business hours.

[Authority for term: OAC rule 3745-21-25(P)(4) and OAC rule 3745-77-07(A)(3)]

(10) The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart WWWW, including the following sections:

§63.5840	Date for initial compliance demonstration
§63.5860(a), Tables 8 and 9	Records to demonstrate initial compliance with organic HAP emission limit and work practice standards
§63.5895(c) and (d)	Resin and gel coat record keeping
§63.5900(a)(2) and (a)(4)	Demonstrate continuous compliance with organic HAP emission limit and work practice standards
§63.5900(c)	Continuous compliance during periods of startup, shutdown or malfunction
§63.5915(a), (c) and (d)	Required records
§63.5920(a) through (d)	Record keeping format and retention

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director (appropriate Ohio EPA District Office or Local Air Agency), 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)]

(2) The permittee shall notify the appropriate Ohio EPA District Office or Local Air Agency in writing that an affected operation is subject to OAC rule 3745-21-25. The notification, which shall be submitted not later than the date of initial startup of the affected operation, shall provide the following information:

a. Name and address of the owner or operator.

b. Address (i.e., physical location) of the facility.

c. Equipment description and Ohio EPA application number (if assigned) of the affected operation.

d. Identification of the applicable requirements, the means of compliance and the compliance date for the affected operation under OAC rule 3745-21-25.

e. An application for an operating permit or an application for a modification to an operating permit in accordance with Chapter 3745-77 of the Administrative Code (for sources subject to the Title V permit program) for each subject process that meets one of the following:

i. The process does not possess an effective operating permit.

ii. The process possesses an effective operating permit and the owner or operator cannot certify in writing to the director that such subject process is in

compliance with this rule. An application for an operating permit is not required provided the subject process is operating under an effective permit and certifies compliance. Such certification shall include all compliance certification requirements under OAC rule 3745-21-25(Q)(3).

[Authority for term: OAC rule 3745-21-25(S)(1) and OAC rule 3745-77-07(A)(3)]

(3) The permittee shall submit semiannual compliance status reports containing the following information:

a. Company name and address.

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

c. Date of the report and beginning and ending dates of the reporting period.

d. If there are no deviations from any VOC emissions limitations and operating limits that apply and there are no deviations from the work practice standards in Table 1 of OAC rule 3745-21-25, a statement that there were no deviations from VOC emissions limitations, operating limits or work practice standards during the reporting period.

e. For each deviation from a VOC emissions limitation or operating limit and for each deviation from a work practice standard that occurs, the compliance report shall contain the information:

i. The total operating time of each affected operation during the reporting period.

ii. Information on the number, duration and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

f. Where multiple compliance options are available, the permittee shall state if the compliance option has changed since the last compliance report.

The semiannual compliance status reports shall be submitted no later than 30 calendar days after the end of each six-month period to the appropriate Ohio EPA District Office or Local Air Agency. The first compliance report shall cover the period beginning on the compliance date that is specified in OAC rule 3745-21-25(R) and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date. Each subsequent compliance report shall cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

[Authority for term: OAC rule 3745-21-25(Q)(1)&(3) and OAC rule 3745-77-07(A)(3)]

(4) For each facility that is subject to permitting requirements pursuant to Chapter 3745-77 of the Administrative Code (pertaining to Title V permits), the permittee may submit the first and subsequent semiannual compliance reports according to the dates established within the facility's Title V permit, instead of according to the dates specified in e)(4) of this permit.

[Authority for term: OAC rule 3745-21-25(Q)(2) and OAC rule 3745-77-07(A)(3)]

(5) The permittee shall report if the facility exceeded the 100 tons of VOC per year emissions threshold if that exceedance would make the facility subject to OAC rule 3745-21-25(D)(3).

[Authority for term: OAC rule 3745-21-25(Q)(4) and OAC rule 3745-77-07(A)(3)]

(6) Each facility that has obtained a Title V permit pursuant to Chapter 3745-77 of the Administrative Code shall report all deviations as described in OAC rule 3745-21-25 in the semiannual monitoring report required by the Title V permit. If the facility submits a semiannual compliance report pursuant to OAC rule 3745-21-25 along with, or as part of, the semiannual monitoring report required by the facility's Title V permit, and the semiannual compliance report includes all required information concerning deviations from any VOC emissions limitation, operating limit, or work practice standard in OAC rule 3745-21-25, submission of the semiannual compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the appropriate Ohio EPA District Office or Local Air Agency.

[Authority for term: OAC rule 3745-21-25(Q)(5) and OAC rule 3745-77-07(A)(3)]

(7) The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart WWWW, including the following sections:

§63.5900(b)	Deviations of continuous compliance
§63.5905(a) and (b), Table 13	Applicability and timing of notifications
§63.5910(a) through (d), Table 14	Requirements for compliance reports
§63.5910(f)	Exceedances of 100 tpy organic HAP emissions threshold
§63.5910(g)	Deviations of this subpart reported in the semiannual report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A)
§63.5910(i)	Change of compliance option

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 emissions shall not exceed 3.94 tons per month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the allowable VOC emission limit identified above shall be demonstrated by the record keeping requirements specified in section d)(1) of this permit.

If required, compliance shall be determined in accordance with the requirements of U.S. EPA Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A.

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

b. Emissions Limitation:

VOC emissions shall not exceed 113 pounds per ton of resin applied based on a 12-month rolling average.

Applicable Compliance Method:

Compliance with the allowable VOC emission limit identified above shall be demonstrated by the record keeping requirements specified in sections d)(3) through d)(5) and f)(2) of this permit.

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

c. Emissions Limitation:

Organic HAP emissions shall not exceed 113 pounds per ton based on a 12-month rolling average.

Applicable Compliance Method:

Compliance with the allowable HAP emission limitation identified above shall be demonstrated in accordance with 40 CFR Part 63, Subpart WWWW as specified in section d)(10) of this permit.

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

(2) Procedures for determination of VOC emissions factors for reinforced plastic composites production operations and determination of monomer content of resins and gel coats.

a. Emissions factors are used in OAC rule 3745-21-25 to determine compliance with VOC emissions limits in Table 2 of this rule and to calculate VOC emissions. The permittee may use the equations in Table 1 of 40 CFR Part 63, Subpart WWWW to calculate such emissions factors or may use any VOC emissions factor approved by U.S. EPA, such as emission factors or emission factor equations from AP-42. These equations and emissions factors are intended to provide a method to demonstrate compliance without the need to conduct a VOC emissions test. In lieu of these equations and emissions factors, the permittee can elect to use site-specific VOC emissions factors to demonstrate compliance and to calculate VOC emissions provided the site-specific VOC emissions factors are incorporated in the facility's air emissions permit and are based on actual facility VOC emissions test data using the test procedures in 40 CFR 63.5850

or OAC rule 3745-21-10(C). Stack test data for the facility shall supersede emission factors and other emission estimating techniques.

b. In order to determine the monomer content of resins and gel coats, the permittee may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified below, as applicable.

i. Include in the total monomer content each monomer compound that is present at 0.1% by mass or more for OSHA-defined carcinogens, as specified in paragraph A.6.4.1 of 29 CFR 1910.1200, appendix A and at 1.0% by mass or more for other monomer compounds.

ii. If the monomer content is provided by the material supplier or manufacturer as a range, the permittee shall use the upper limit of the range for determining compliance. If a separate measurement of the total monomer content, such as an analysis of the material by U.S. EPA method 311 of 40 CFR Part 63, appendix A, exceeds the upper limit of the range of the total monomer content provided by the material supplier or manufacturer, then the permittee shall use the measured monomer content to determine compliance.

iii. If the monomer content is provided as a single value, the permittee may use that value to determine compliance. If a separate measurement of the total monomer content is made and is less than two percentage points higher than the value for total monomer content provided by the material supplier or manufacturer, then the permittee still may use the provided value to demonstrate compliance. If the measured total monomer content exceeds the provided value by two percentage points or more, then the permittee shall use the measured total monomer content to determine compliance.

[Authority for term: OAC rule 3745-21-25(E) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.