



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

7/22/2013

Gregg Richley
AJAX - TOCCO MAGNETHERMIC
1745 OVERLAND AVE NE
WARREN, OH 44483

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0278080137
Permit Number: P0112914
Permit Type: Renewal
County: Trumbull

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NEDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
AJAX - TOCCO MAGNETHERMIC**

Facility ID:	0278080137
Permit Number:	P0112914
Permit Type:	Renewal
Issued:	7/22/2013
Effective:	7/22/2013
Expiration:	7/22/2023



Division of Air Pollution Control
Permit-to-Install and Operate
for
AJAX - TOCCO MAGNETHERMIC

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Final Permit-to-Install and Operate
AJAX - TOCCO MAGNETHERMIC
Permit Number: P0112914
Facility ID: 0278080137
Effective Date: 7/22/2013

Authorization

Facility ID: 0278080137
Application Number(s): A0045971
Permit Number: P0112914
Permit Description: PTIO renewal for emission units K001 (Binks Spray Paint Booth), K002 (Varnish Dip/Bake Line), N001 (Bayco Heat Cleaning Oven), and P006 (Shot Blast). This is an administrative modification to include the VOC emissions from the clean up materials and reducer utilized in the coating operations. This renewal administratively modifies the emissions limitations for K001. The increase in VOC emissions is due to cleanup and thinner usage for K001.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 7/22/2013
Effective Date: 7/22/2013
Expiration Date: 7/22/2023
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

AJAX - TOCCO MAGNETHERMIC
1745 OVERLAND AVE NE
WARREN, OH 44483

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

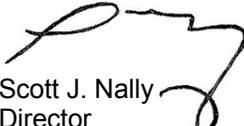
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally
Director



Authorization (continued)

Permit Number: P0112914

Permit Description: PTIO renewal for emission units K001 (Binks Spray Paint Booth), K002 (Varnish Dip/Bake Line), N001 (Bayco Heat Cleaning Oven), and P006 (Shot Blast). This is an administrative modification to include the VOC emissions from the clean up materials and reducer utilized in the coating operations. This renewal administratively modifies the emissions limitations for K001. The increase in VOC emissions is due to cleanup and thinner usage for K001.

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

Emissions Unit ID:	K001
Company Equipment ID:	Binks Paint Spray Booth
Superseded Permit Number:	P0086227
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Varnish Dip Line
Superseded Permit Number:	P0086227
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	N001
Company Equipment ID:	bayco heat cleaning oven
Superseded Permit Number:	P0086227
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	Shot blast room
Superseded Permit Number:	P0086227
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
AJAX - TOCCO MAGNETHERMIC
Permit Number: P0112914
Facility ID: 0278080137
Effective Date: 7/22/2013

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Final Permit-to-Install and Operate
AJAX - TOCCO MAGNETHERMIC
Permit Number: P0112914
Facility ID: 0278080137
Effective Date: 7/22/2013

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

AJAX - TOCCO MAGNETHERMIC

Permit Number: P0112914

Facility ID: 0278080137

Effective Date: 7/22/2013

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



Final Permit-to-Install and Operate
AJAX - TOCCO MAGNETHERMIC
Permit Number: P0112914
Facility ID: 0278080137
Effective Date: 7/22/2013

C. Emissions Unit Terms and Conditions



1. K001, Binks Paint Spray Booth

Operations, Property and/or Equipment Description:

Binks Paint Spray Booth

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

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

a. 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)	<p>Volatile organic compound (VOC) emissions shall not exceed 68.4 pounds per day and 12.4 tons per year.</p> <p>See section b)(2)a. below</p>
b.	OAC rule 3745-21-09(U)(2)(e)(iii)	The usage restriction required by this rule is equivalent to the usage restriction established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The maximum daily coating usage for this emissions unit shall not exceed 10 gallons of coating in any one day.



c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following daily records for each emissions unit:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating, in pounds per gallon; and
 - d. the total VOC emission rate for all coatings employed, as calculated by the following equation, in pounds per day:

$$\text{VOC} \left(\frac{\text{lbs}}{\text{day}} \right) = y \times \text{EF}$$

where:

y = daily gallons of coatings employed

EF = lb of VOC/ gallon

- (2) The permittee shall collect and record the following information for each month:
 - a. the company identification of each thinner and cleanup material employed;
 - b. the number of gallons of each thinner and cleanup material employed;
 - c. the VOC content of each thinner and cleanup material employed, in pounds per gallon;
 - d. the total VOC emissions from all thinner and cleanup materials employed, in pounds, i.e., the sum of d)(2)b. times d)(2)c. for each cleanup employed;
 - e. if cleanup materials are collected for off-site disposal and/or recovery, the following records shall be maintained if a credit is to be applied to the monthly VOC emissions:



- i. the amount of cleanup material recovered during the month* for off-site disposal and/or recovery, in gallons (or pounds, if records of recovered cleanup material is maintained by weight and VOC content in percent by weight);
 - ii. the VOC content of the recovered cleanup material shall be based on the lowest VOC content of any cleanup material collected, in pounds per gallon (or percent by weight); or it may be based upon a laboratory analyses provided by the facility to which the waste solvent is shipped;
 - iii. the date the recovered cleanup material was shipped, the amount shipped (minus the container), and the name and address of the receiving, disposal, and/or recovery facility; and
- f. the total monthly VOC emission from cleanup operations, in pounds, i.e., [d)(2)d.] – [d)(2)e.i. x d)(2)e.ii.].

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

- (3) The permittee shall calculate and record the total annual VOC emissions from coatings, thinner, and cleanup materials, i.e., the sum of the daily VOC emission rates from the coating materials for the calendar year plus the sum of the monthly emissions from cleanup materials for the calendar year [d)(1)d + d)(2)d. or d)(2)f].
- (4) The permittee shall conduct periodic inspections of the dry filtration system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, and/or operating manual and/or in accordance with any documented modifications deemed necessary by the permittee. The inspection frequency shall be based upon the recommendation of the manufacturer.
- (5) In addition to the recommended periodic inspections, the permittee shall conduct a comprehensive inspection of the dry filtration system at least once per year while the coating operations are shut down and shall perform any needed maintenance and repair.
- (6) The permittee shall maintain the following information for the dry filtration system:
 - a. documentation of the manufacturer's recommendations, instructions, or operating manual, along with documentation of any modifications deemed necessary by the permittee;
 - b. any period(s) of time when the dry filtration system was not in service when the emissions unit was in operation;



- c. any period(s) of time (during coating operations) when the dry filtration system was not operating according to the manufacturer's recommendations and/or according to documented modifications to the manufacturer's recommendations deemed necessary by the permittee; and
- d. records for each inspection (periodic and annual) of the dry filtration system to include the following information:
 - i. the date of the inspection;
 - ii. a description of each/any problem identified and the date it was corrected;
 - iii. a description of any maintenance and repairs performed and the date; and
 - iv. the name of person who performed the inspection.

The manufacturer's operation manual, along with any documented modifications determined necessary by the permittee, shall be maintained at the facility at all times. Records of malfunction, maintenance, and inspections of the dry filtration system shall be maintained for a period of not less than five years from the date of record and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall notify the Ohio EPA's Northeast District Office (NEDO) in writing of the following:
 - a. any daily record showing that the coating usage exceeded 10 gallons in any one day; and
 - b. each daily record showing the daily VOC emissions calculated in d)(1)d, exceeded the pounds per day emissions limitation.

The notification shall include a copy of each such record and it shall be sent to Ohio EPA's NEDO within 30 days following the end of the calendar month during which more than 10 gallons of coating was applied in any one day and/or the daily VOC emissions limitation was exceeded.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA's Northeast District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered. The annual compliance reports shall include:



- a. a statement as to whether the coating operation was in compliance with each of the listed applicable rules and requirements, including whether the records of the coating material usage demonstrated that daily emissions, as calculated in d)(1), or annual emissions, as calculated in d)(3), did not exceed the daily or annual VOC limits specified in b)(1)a.
 - b. identification of any period of time (date and number of hours) when the dry filtration system was not in service or was not operating in accordance with the manufacturer's or permittee's documented instructions during coating operations.
- 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:

VOC emissions shall not exceed 68.4 pounds per day and 12.4 tons per year.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in d)(1)f and d)(3) of these terms and conditions.
 - b. Emissions Limitations:

The maximum daily coating usage for this emissions unit shall not exceed 10 gallons of coating in any one day.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in d)(1).
- g) **Miscellaneous Requirements**
- (1) None.



2. K002, Varnish Dip Line

Operations, Property and/or Equipment Description:

Varnish Dip Line

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

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

a. 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)	<p>Volatile organic compounds (VOC) emissions shall not exceed 1,200 pounds per month and 7.3 tons per year.</p> <p>See section b)(2)a.-b. below</p>
b.	OAC rule 3745-21-09(U)(1)(a)	The emission limitation required by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The VOC content shall not exceed 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents.

b. The dip tank shall be kept covered when it is not being used.



c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following monthly records for this emissions unit:

- a. the company identification for each coating employed;
- b. the number of gallons of each coating employed;
- c. the VOC content of each coating, in pounds per gallon; and
- d. the total VOC emission rate for all coatings employed, as calculated by the following equation, in pounds per month:

$$\text{VOC} \left(\frac{\text{lbs}}{\text{month}} \right) = y \times \text{EF}$$

where:

y = monthly gallons of coatings employed

EF = lb of VOC/ gallon

e) Reporting Requirements

- (1) The permittee shall notify the Ohio EPA's Northeast District Office (NEDO) in writing of the following:

- a. any daily record showing that the VOC content exceeded 4.3 pounds of VOC per gallon, excluding water and exempt solvents; and
- b. each monthly record showing the monthly VOC emissions calculated in d)(1)d, exceeded the pounds per month emissions limitation.

The notification shall include a copy of each such record and it shall be sent to Ohio EPA's NEDO within 30 days following the end of the calendar month during which the noncompliant coating was used and/or the monthly VOC emissions limitation was exceeded.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA's Northeast District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.



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. Emission Limitation:

VOC emissions shall not exceed 1,200 pounds per month and 7.3 tons per year.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in d)(1) of these terms and conditions.

The tpy emission limitation was developed by multiplying the monthly OC emission limitation (1,200 lbs/month) by 12 months per year, and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the monthly emission limitation, compliance shall also be shown with the annual emission limitation.

b. Emission Limitation:

VOC emissions shall not exceed 4.3 lbs VOC/gallon coating excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping in d)(1). USEPA Method 24 shall be used to determine the VOC contents of the coatings employed. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

g) Miscellaneous Requirements

(1) None.



3. N001, bayco heat cleaning oven with afterburner

Operations, Property and/or Equipment Description:

Bayco heat cleaning oven with afterburner

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. 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)	<p>Particulate emissions (PE) shall not exceed 0.11 lb per hour and 0.48 ton per year.</p> <p>PE shall not exceed 0.20 lb per 100 lbs of charge.</p> <p>Visible particulate emissions from any stack serving this emissions unit shall not exceed five (5) percent opacity, except for 6-minutes in any continuous 60-minute period during which the opacity shall not exceed 20%.</p> <p>See section b)(2)a. below.</p>
b.	OAC rule 3745-17-07(A)(1)	The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-09(B)	The emission limitation specified in this rule is less stringent than or equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The annual particulate emission limitation specified above represents this emissions unit's potential to emit. Therefore, no annual records are required to determine compliance with this limitation.

c) Operational Restrictions

- (1) The afterburner for this emissions unit must be operated at a temperature of at least 1,400 degrees Fahrenheit at all times during which this emission unit is operated as a burn off incinerator. The afterburner shall be pre-heated thirty minutes (or a time established during compliance testing) prior to ignition of charge and continued in use during the entire burn cycle.

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature, in degrees Fahrenheit, of the afterburner when the emissions unit is operated as a burn off incinerator. The monitoring and recording device shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. All temperature records shall be maintained by the permittee for a period of at least two years and shall be made available for inspection by Ohio EPA during normal business hours.

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

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;



- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

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

- (3) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (4) The permittee shall maintain annual records of the amount of natural gas used by this emissions unit in standard cubic feet (scf).

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered. The PER shall include identification of the following:
 - a. the total annual emissions of PM from this emissions unit for the previous calendar year;
 - b. the day(s) during which visible particulate emissions were observed from the afterburner stack and the corrective action(s) taken to eliminate the visible emissions; and
 - c. the day(s) during which a fuel other than natural gas was burned in the cremation unit, including the type and quantity of fuel used.

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. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.11 lb per hour and 0.20 lb per 100 lbs of charge.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

b. Emissions Limitation:

PE shall not exceed 0.48 ton per year.

Applicable Compliance Method:

The annual emissions limit was established by multiplying the hourly allowable emissions limit (0.11 lb/hr) by 8760 hrs/yr then dividing by 2000 lbs/ton. Therefore, compliance with the annual emissions limitation shall be ensured provided compliance is maintained with hourly allowable PE emissions limitation.

c. Emission Limitation:

Visible particulate emissions from any stack serving this emissions unit shall not exceed five (5) percent opacity, except for 6-minutes in any continuous 60-minute period during which the opacity shall not exceed 20%.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

- (1) None.



4. P006, Shot blast room

Operations, Property and/or Equipment Description:

Shot blast operation with baghouse

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

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

a. 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)	Particulate emissions (PE) shall not exceed 2.0 pounds per hour and 6.2 tons per year. See section b)(2)a. below.
b.	OAC rule 3745-17-07(A)(1)	Visible PE, from the stack, shall not exceed twenty-percent opacity as a six-minute average, except as provided by the rule.
c.	OAC rule 3745-17-11	The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.



c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

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

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
 - a. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse



- b. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
- c. any corrective actions taken to minimize or eliminate the visible particulate emissions.

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. Emission Limitation:

PE shall not exceed 2.0 lbs/hr and 6.2 tons/yr.

Applicable Compliance Method:

Compliance with the hourly emissions limitation shall be determined based on a one time calculation by using emission factors from AP-42, Section 13.2-1 (1997 update) for sandblasting (27 lbs/1000 lbs abrasive), and the maximum abrasive usage weight rate from the application.

$E(\text{PE})_{\text{blasting}} = 27 \text{ lbs}/1000 \text{ lbs abr.} \times 1000 \text{ lbs/hr} \times \text{control efficiency,}$

where control efficiency is estimated at 98% or (1-0.98 for formula).

Compliance with the annual emissions limitation shall be determined by multiplying hourly emissions rate E(PE) total in lbs/hr by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

- b. Emission Limitation:

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

Applicable Compliance Method

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

- (1) None.