



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

8/20/2013

Mr. Matt Tripp
Industrial Coating Solutions
4650 Kenny Rd
Columbus, OH 43220

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0125044168
Permit Number: P0115122
Permit Type: Initial Installation
County: Franklin

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
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Columbus Dispatch. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically 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. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

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

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

PUBLIC NOTICE

8/20/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

Industrial Coating Solutions

4650 Kenny Rd,

Columbus, OH 43220

Franklin County

FACILITY DESC.: Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers

PERMIT #: P0115122

PERMIT TYPE: Initial Installation

PERMIT DESC: Air permit for 2 spray booths that will have a combined VOC limit and a synthetic minor limit for HAPs.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Stephanie Habinak, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

K001 - NorAm 8590-45 spray booth which employs an airless spray gun and coats metal

K002 - Colmet 8550 Paint Booth which employs an airless sprayer and coats metal.

3. Facility Emissions and Attainment Status:

The facility has accepted a synthetic minor limitation for HAPs by limiting the coating usage between K001 and K002 to 18,000 gallons, per rolling, 12-month summation and will not trigger Title V. Franklin County is currently in non-attainment for the annual 1997 PM_{2.5} standard, and the 2008 8-hour ozone standard.

4. Source Emissions:

The spray booths are a source of VOC, PE, and HAP emissions. The facility has accepted a synthetic minor limit on HAP emissions for 9.9 and 24.9 tons per rolling, 12-month summation. VOC emissions are combined between K001 and K002, and are 54 tons per rolling, 12-month summation. The spray booths also have PE limits that will sunset because they are less than 10 tpy.

5. Conclusion:

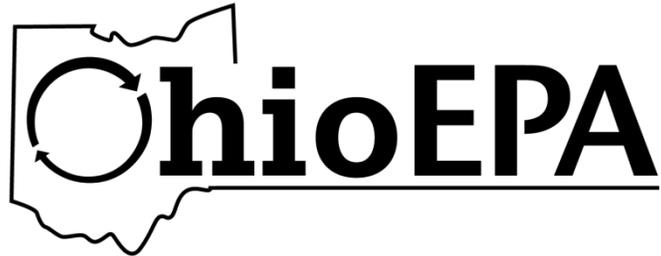
The emissions units will be adequately permitted by limiting HAP emissions through the annual coating usage and VOC emissions.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>VOC</u>	<u>54</u>
<u>PE</u>	<u>1.1</u>
<u>HAPs</u>	<u>9.9/24.9</u>



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Industrial Coating Solutions**

Facility ID:	0125044168
Permit Number:	P0115122
Permit Type:	Initial Installation
Issued:	8/20/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Industrial Coating Solutions

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit?	4
3. What records must I keep under this permit?	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application?	4
6. What happens to this permit if my project is delayed or I do not install or modify my source?	5
7. What reports must I submit under this permit?	5
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?	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?	7
15. What happens if a portion of this permit is determined to be invalid?	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions	10
1. Emissions Unit Group -Spray Booths: K001,K002.....	11



Draft Permit-to-Install and Operate

Industrial Coating Solutions

Permit Number: P0115122

Facility ID: 0125044168

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0125044168
Application Number(s): A0048042
Permit Number: P0115122
Permit Description: Air permit for 2 spray booths that will have a combined VOC limit and a synthetic minor limit for HAPs.
Permit Type: Initial Installation
Permit Fee: \$600.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 8/20/2013
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Industrial Coating Solutions
4650 Kenny Rd
Columbus, OH 43220

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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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: P0115122

Permit Description: Air permit for 2 spray booths that will have a combined VOC limit and a synthetic minor limit for HAPs.

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

Group Name: Spray Booths

Emissions Unit ID:	K001
Company Equipment ID:	NorAm 8590-45
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Colmet 8550
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate

Industrial Coating Solutions

Permit Number: P0115122

Facility ID: 0125044168

Effective Date: To be entered upon final issuance

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, Central 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.

¹ Permittees 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.



Draft Permit-to-Install and Operate
Industrial Coating Solutions
Permit Number: P0115122
Facility ID: 0125044168
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install and Operate

Industrial Coating Solutions

Permit Number: P0115122

Facility ID: 0125044168

Effective Date: To be entered upon final issuance

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.



Draft Permit-to-Install and Operate
Industrial Coating Solutions
Permit Number: P0115122
Facility ID: 0125044168
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group -Spray Booths: K001,K002

EU ID	Operations, Property and/or Equipment Description
K001	NorAm 8590-45 spray booth which employs an airless spray gun and coats metal
K002	Colmet 8550 Paint Booth which employs an airless sprayer and coats metal.

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. b)(1)g., d)(5) – (8), e)(6)

(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. b)(1)d., c)(1), d)(3), e)(2)a.ii. – iv.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	Volatile organic compound (VOC) emissions combined for K001 and K002 shall not exceed 54 tons per rolling, 12- month summation.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions (PE) shall not exceed 0.25 pounds per hour (lbs/hr) and 1.1 tons per year (tpy). See b)(2)a.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-31-05(D) [Synthetic minor to avoid TV]	Individual hazardous air pollutant (HAP) emissions from all coatings and cleanup/solvent materials employed in emissions units K001 and K002, combined shall not exceed 9.9 tons per rolling, 12-month period. Combined HAP emissions from all



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		coatings and cleanup/solvent materials employed in emissions units K001 and K002, combined shall not exceed 24.9 tons per rolling, 12-month period. See c)(1)
e.	OAC rule 3745-17-11(C)	See b)(2)c.
f.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)d.
g.	ORC 3704.03(F)	See d)(4) – (7), e)(6)

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio’s State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE emissions from this air contaminant source since the potential to emit for PE is less than 10 tons/year.
- c. The emissions units are exempt from the requirements of OAC rule 3745-17-11(C), per OAC rule 3745-17-11(A)(1)(j).
- d. The permittee shall not employ more than ten gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.

c) Operational Restrictions

- (1) The maximum annual coating usage for K001 and K002 shall not exceed 18,000 gallons, based upon a rolling, 12-month summation of the coating usage figures. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar



months following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	1500
1-2	3000
1-3	4500
1-4	6000
1-5	7500
1-6	9000
1-7	10,500
1-8	12,000
1-9	13,500
1-10	15,000
1-11	16,500
1-12	18,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each day for the emissions units K001 and K002:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all of the coatings employed.
- (2) The permittee shall collect and record the following information each month for emissions units K001 and K002:
 - a. the company identification number for each coating and cleanup material employed;
 - b. the total number of gallons of coating and cleanup material employed;
 - c. the VOC content of each coating and cleanup material employed, in pounds per gallon;
 - d. the VOC emissions from the coating and cleanup materials employed; and
 - e. the updated rolling, 12-month summation of the total VOC emissions in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.



- (3) The permittee shall maintain monthly records of the following information for emissions units K001 and K002:
- a. the coating usage for each month; and
 - b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the coating usage figures.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month.

- (4) The permittee shall collect and record the following information each month for emissions units K001 and K002:
- a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating, as applied;
 - c. the individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - d. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from c);
 - e. the number of gallons of each coating employed;
 - f. the name and identification of each cleanup/solvent material employed;
 - g. the VOC content of each cleanup/solvent material employed;
 - h. the individual HAP content of each HAP of each cleanup/solvent material in pounds of individual HAP per gallon cleanup/solvent material, as applied;
 - i. the total combined HAP content of each cleanup/solvent material in pounds of combined HAPs per gallon of cleanup/solvent material, as applied (sum of all individual HAP contents from h.)
 - j. the number of gallons of each cleanup/solvent material employed;
 - k. the total VOC emissions from all coating, in pounds or tons per rolling, 12-month period (the sum of b. times e. for each coating);
 - l. the total VOC emissions from all cleanup/solvent materials, in pounds or tons per rolling, 12-month period (the sum of g. times j. for each cleanup/solvent material);
 - m. the total individual HAP emissions for each HAP from all coating and cleanup/solvent material in pounds or tons per rolling, 12-month period (for each



HAP the sum of c. times e. for each coating and the sum of h. times j. for each cleanup/solvent material); and

- n. The total combined HAP emissions from all coating and cleanup/solvent materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of d. times e. for each coating plus the sum of i. times j. for each cleanup/solvent material).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting you Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvent contained in the interior coatings or clean materials. This information does not have to be kept on a line by line basis.

- (5) The federally enforceable permit-to-install and operate (FEPTIO) application for this/these emissions unit(s), **K001** and **K002**, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "**24**" hours per day and "**7**" days



per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: **Ethylbenzene**

TLV (mg/m3): **434.19**

Maximum Hourly Emission Rate (lbs/hr): **0.80**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **46.95**

MAGLC (ug/m3): **10337.86**

Toxic Contaminant: **Xylene**

TLV (mg/m3): **434.19**

Maximum Hourly Emission Rate (lbs/hr): **2.19**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **1020**

MAGLC (ug/m3): **10337.86**

Toxic Contaminant: **Methyl Isobutyl Ketone**

TLV (mg/m3): **70.46**

Maximum Hourly Emission Rate (lbs/hr): **1.10**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **64.55**

MAGLC (ug/m3): **1677.62**

The permittee, has demonstrated that emissions of Ethylbenzene, Xylene, and Methyl Isobutyl Ketone, from emissions unit(s) **K001** and **K002**, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (6) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and



- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

- (7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (8) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.



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.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following for K001 and K002:
 - a. all deviations (excursions of the following emission limitations, operational restrictions and/or control device operating parameters limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping and/or testing requirements in this permit:
 - i. the rolling, 12-month total VOC emissions limitation;
 - ii. all exceedances of the rolling, 12-month limitation on coating usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels;
 - iii. the rolling, 12-month total individual HAP emission limitation;
 - iv. the rolling, 12-month total combined HAP emissions limitation; and
 - v. each day the coating usage rate exceeded 10 gallons per day.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter. The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the Standard Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.
- (4) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and



identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

- (5) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 10 gallons per day. The notification shall include a copy of such record and shall be sent to the appropriate District Office or local air agency within 45 days after the exceedance occurs.
- (6) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

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 for K001 and K002 shall not exceed 54 tons per rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in d)(2)e.

b. Emission Limitation:

PE emissions shall not exceed 0.25 lbs/hr and 1.1 tpy

Applicable Compliance Method:

If required, compliance shall be determined based on the follow equation:

$$(\text{max. solid content for all coatings}) * (\text{max. hourly usage}) * (1-0.65) * (1-0.98)$$

where,

max. solid content for all coatings = 18 lbs/gal

max. hourly usage = 2 gal/hr

spray gun manufacturer estimated transfer efficiency = 65%

booth filter control efficiency = 98%



The annual limit shall be calculated by multiplying the short-term lb/hr limit by 8760 hrs/yr and dividing by 2000 lbs.

c. Emission Limitation:

The coating usage for K001 and K002 shall not exceed 18,000 gallons, per rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the monitoring and recordkeeping specified in section d)(3).

d. Emission Limitation:

HAP emissions from K001 and K002 shall not exceed 9.9 tpy for single HAP and 24.9 tpy for combined HAPs.

Applicable Compliance Method:

Compliance shall be based upon the monitoring and recordkeeping specified in section d)(3).

e. Emissions Limitation:

Use no more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in d)(1)c.

g) Miscellaneous Requirements

(1) None.