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

9/25/2013

Certified Mail

Mark Tondra
Penn-Ohio Coal Co. - Crooked Run
3596 St. Rt. 39 NW
Dover, OH 44622

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0679020170
Permit Number: P0109644
Permit Type: OAC Chapter 3745-31 Modification
County: Tuscarawas

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/survey.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, Southeast District Office at (740)385-8501or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-SEDO

Response to Comments

Facility ID:	0679020170
Facility Name:	Penn-Ohio Coal Co. - Crooked Run
Facility Description:	Equipment Maintenace, Fabrication & Repair Facility
Facility Address:	3409 Crooked Run Rd. New Philadelphia, OH 44663 Tuscarawas County
Permit:	P0109644, Permit-To-Install and Operate - OAC Chapter 3745-31 Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Times-Reporter on 08/22/2013. The comment period ended on 09/21/2013.	
Hearing date (if held)	**None**
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

a. Comment: None

b. Response: None

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Penn-Ohio Coal Co. - Crooked Run

Facility ID:	0679020170
Permit Number:	P0109644
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	9/25/2013
Effective:	9/25/2013
Expiration:	8/13/2018

Division of Air Pollution Control
Permit-to-Install and Operate
for
Penn-Ohio Coal Co. - Crooked Run

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 - Paint Booths: K001, K002 11

Authorization

Facility ID:	0679020170
Application Number(s):	A0043992, A0043994
Permit Number:	P0109644
Permit Description:	Chapter 31 modification for two existing coating booths to address changes in products coated and coatings used and update the synthetic minor restrictions on VOC and HAP emissions
Permit Type:	OAC Chapter 3745-31 Modification
Permit Fee:	$800.00
Issue Date:	9/25/2013
Effective Date:	9/25/2013
Expiration Date:	8/13/2018

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Penn-Ohio Coal Co. - Crooked Run
3409 Crooked Run Rd.
New Philadelphia, OH 44663

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, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

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: P0109644
Permit Description: Chapter 31 modification for two existing coating booths to address changes in products coated and coatings used and update the synthetic minor restrictions on VOC and HAP emissions

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

Group Name: Paint Booths

Emissions Unit ID:	**K001**
Company Equipment ID:	Paint Booth #1
Superseded Permit Number:	06-07044
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Paint Booth #2
Superseded Permit Number:	06-07044
General Permit Category andType:	Not Applicable

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 takenby 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, Southeast 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 submitting[1] 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.

B. Facility-Wide Terms and Conditions

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.

2. The Ohio EPA has determined that this facility may be subject to the requirements of one or more area source MACT/GACT rule(s) that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that one or more area source MACT(s)or GACT(s) may apply, at this time Ohio EPA does not have the authority to enforce these standards. Instead, U.S. EPA has the authority to enforce these standards. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: http://www.epa.gov/ttn/atw/area/arearules.html.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - PaintBooths: K001, K002

EU ID	Operations, Property and/or Equipment Description
K001	Paint Booth #1; metal parts/equipment spray booth with 100% capture, usingHVLP spray guns, controlled with dry particulate filters with a 98% control efficiency for particulate, and using only exempt cleanup solvent; Chapter 31 modification in April of 2008 due to changes in types of parts/equipment coated, changes in coatings used and increases in potential coating use rates; supersedes PTI # 06-07044 issued on December 12, 2002
K002	Paint Booth #2; metal parts/equipment spray booth with 100% capture, usingHVLP spray guns, controlled with dry particulate filters with a 98% control efficiency for particulate, and using only exempt cleanup solvent; Chapter 31 modification in April of 2008 due to changes in types of parts/equipment coated, changes in coatings used and increases in potential coating use rates; supersedes PTI # 06-07044 issued on December 12, 2002

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. d)(4)-(7) and 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. 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)	Volatile organic compound (VOC) emissions from coating use shall not exceed 14.85 pounds per hour. VOC emissions shall not exceed 53.74 tons per year. The requirements of this rule include compliance with the requirements of OAC rule 3745-21-09(U)(1).
b.	OAC rule 3745-31-05(D)	VOC emissions from coatings and

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(Synthetic minor restrictions to avoid Title V and MACT major source status)	cleanup material use at the facility (emissions units K001 and K002) shall not exceed 99.0 tons based on a rolling, 12-month summation. Emissions of any single hazardous air pollutant (HAP) from coatings and cleanup material use at the facility (emissions units K001 and K002) shall not exceed 9.9 tons based on a rolling, 12-month summation. Total HAP emissions from coatings and cleanup material use at the facility (emissions units K001 and K002) shall not exceed 24.9 tons based on a rolling, 12-month summation. See c)(1) below.
c.	OAC rule 3745-21-09(U)(1)(d)	The VOC content of the coatings employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents, as a daily volume-weighted average. See b)(2)a. below.
d.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions (PE) shall not exceed 0.13 lb/hr and 0.58 ton per year. No visible PE from any stack serving this emissions unit. See b)(2)b. below.
e.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)c. below.
f.	OAC rule 3745-17-11(B)	PE shall not exceed 0.551 pound per hour. This emissions limitation is less stringent than the limitations listed under OAC rule 3745-31-05(A)(3), until such time as U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.
g.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		consecutive minutes in any sixty minutes. Visible PE shall not exceed sixty percent opacity, as a six minute average, at any time. This emissions limitation is less stringent than the limitations listed under OAC rule 3745-31-05(A)(3), until such time as U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.

(2) Additional Terms and Conditions

a. The requirements of OAC rule 3745-21-09(U)(1)(d) do not apply to the repainting (refinishing) of used motor vehicles and trailers or to the application of a customized topcoat and any related customized singlecoat to motor vehicles, if the maximum number of motor vehicles isless than thirty-five per day pursuant to OAC rules 3745-21-09(U)(2)(c) and (d).

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions 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 revision 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 limits/control measures no longer apply.

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the uncontrolled potential to emit for particulate is less than 10 tons/yr.

c) Operational Restrictions

(1) The maximum material usage for emissions units K001 and K002, combined, shall not cause VOC emissions to exceed 99.0 tons as a rolling, 12-month summation, highest individual HAP emissions to exceed 9.9 tons as a rolling, 12-month summation and total

HAP emissions to exceed 25.9 tons as a rolling, 12-month summation based on the following equations:

a.

$$X = \sum_{i=1}^{n}(G)(VOC)/2{,}000\text{lbs}$$

where:

X= tons of VOC emissions per month;
G= monthly usage of each coating and cleanup material, in gallons;
VOC= VOC content of each coating and cleanup material, in pounds of VOC per gallon;
n = total number of coatings; and

$\sum_{i=1}^{n}(X)$ is ≤ 99.0 tons VOC, as a rolling 12-month summation

where:

n = months in the rolling, 12-month period.

b.

$$Y = \sum_{i=1}^{n}(G)(HAP_{HI})/2{,}000\text{lbs}$$

where:

Y= tons of highest HAP emissions per month;
G= monthly usage of each coating and cleanup material, in gallons;
HAP_{HI}= highest HAP content of each coating and cleanup material, in pounds of highest individual HAP per gallon;
n = total number of coatings; and

$\sum_{i=1}^{n}(Y)$ is ≤ 9.9 tons highest individual HAP, as a rolling 12-month summation

where:

n = months in the rolling, 12-month period.

c.

$$Z = \sum_{i=1}^{n}(G)(HAP_{T})/2{,}000\text{lbs}$$

where:

Z= tons of HAP_T emissions per month;

G= monthly usage of each coating and cleanup material, in gallons;
HAP_T= total HAP content of each coating and cleanup material, in pounds of total HAP per gallon; and
n = total number of coatings; and

$$\sum_{i=1}^{n}(Z) \text{ is } \leq 24.9 \text{ tons total HAP, as a rolling 12-month summation}$$

where:

n = months in the rolling, 12-month period.

The permittee has sufficient monthly records of solvent usage and VOC and HAP emissions to begin calculating the rolling, 12-month summations upon final issuance of this permit.

(2) The permittee shall operate the dry filtration system for control of particulate emissions whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units K001 and K002, combined:

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

b. the number of gallons of each coating applied;

c. the number of gallons of each cleanup material employed;

d. the maximum VOC content of each coating applied, in pounds per gallon;

e. the maximum VOC content of each cleanup material employed, in pounds per gallon;

f. the individual HAP content for each coating and cleanup material, for each HAP, in pounds per gallon;

g. total HAP content for each coating and cleanup material in pounds per gallon;

h. the total VOC emissions from all coatings and cleanup materials employed [the sum of (b. times d.) for all coatings plus (c. times e.) for all cleanup materials] divided by 2,000, in tons;

i. the individual HAP emissions from all coatings and cleanup materials employed [the sum of (b. times f.), for each HAP in all coatings plus (c. times f.) for each HAP in all cleanup materials] divided by 2,000, in tons;

j. the total HAP emissions from all coatings and cleanup materials employed [the sum of (b. times g.) for all coatings plus (c. times g.) for all cleanup materials] divided by 2,000, in tons;

k. the rolling, 12-month summation of the total VOC emissions i.e., the summation of the total VOC emissions, as recorded in "h" above, for the present month plus the previous 11 months of operation, in ton(s), both on a per booth and combined basis;

l. the rolling, 12-month summation of the individual HAP emissions, i.e., the summation of the individual HAP emissions, as recorded in "i" above, for the present month plus the previous 11 months of operation, in ton(s); and

m. the rolling, 12-month summation of the total HAP emissions, i.e., the summation of the individual HAP emissions, as recorded in "j" above, for the present month plus the previous 11 months of operation, in ton(s).

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

(2) The permittee, having chosen to demonstrate compliance by means of a daily volume-weighted average VOC content, shall collect and record the following information each day for the coating line when trash containers are coated:

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

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

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

$$(C_{VOC,2})_A = \sum_{i=1}^{n} C_{VOC,2i} L_{Ci} (V_{Si} + V_{VOCi}) / \sum L_{Ci} (V_{Si} + V_{VOCi})$$

Where:

$(C_{VOC,2})_A$ is the daily volume-weighted average VOC content of all coatings, as applied.

$C_{VOC,2}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

$$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

D_C = density of coating, in pounds of coating per gallon of coating.

$W_{VOC} = W_{VM} - W_W - W_{ES}$

V_S = the volume fraction of solids in coating, in gallons of solids per gallon of coating.

$V_{VOC} = V_{VM} - V_W - V_{ES}$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period "t".

L_C = liquid volume of coating employed during time period "t", in gallons of coating.

M_C = mass of coating employed during the time period "t", in pounds of coating.

i = subscript denoting a specific coating employed during time period "t".

n = total number of coatings employed during time period "t".

t = time period specified for the weighted average VOC content is per day and not included in the calculation.

Formulation data or USEPA Method 24 shall be used to determine the organic compound or VOC content of the coatings and cleanup materials.

(3) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

(4) The federally enforceable permit-to-install and operate (FEPTIO) application for emissions units K001 and K002 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee.

The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted 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):

   $$\text{TLV (ug/m}^3\text{)/10 x 8/24 x 5/7 = 4 TLV/(24 X 7) = MAGLC}$$

d. The following summarizes the results of dispersion modeling for the "worst case" toxic contaminant:

   Toxic Contaminant: toluene (xylene, methanol, ethylbenzene)

   TLV (mg/m3): 75.362 (toluene)

   Maximum Hourly Emission Rate (lbs/hr): 6.38 (toluene)

   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 62.2

   MAGLC (ug/m3): 1,794

The permittee, has demonstrated that emissions of toluene from emissions units 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).

(5) Prior to making any physical changes to or changes in the method of operation of the emissions units, that could impact the parameters or values that were used in the predicted 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", ORC 3704.03(F), 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.

(6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":

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.

(7) 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:

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

i. VOC emissions from all coatings and cleanup materials used at the facility (emissions units K001 and K002) shall not exceed 99.0 tons based on a rolling, 12-month summation.

ii. Emissions of any single hazardous air pollutant (HAP) from the facility shall not exceed 9.9 tons based on a rolling, 12-month summation.

iii. Total HAP emissions from the facility shall not exceed 24.9 tons based on a rolling, 12-month summation.

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 reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(3) The permittee shall notify the Ohio EPA, Southeast District Office in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southeast District Office within 45 days after the exceedance occurs.

(4) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the event occurs.

(5) 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 e-Business 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.

(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 b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emissions Limitation:</u>

VOC emissions from coating use shall not exceed 14.85 pounds per hour.

<u>Applicable Compliance Method:</u>

Compliance with the short-term VOC emissions limitation shall be demonstrated based on the following calculation:

VOC (lbs/hr) = maximum coating VOC content*, as applied, in lbs VOC/gallon X maximum hourly coating application rate, in gallons/hr
= 4.95 lbs VOC/gallon X 3 gallons/hr

= 14.85 lbs VOC/hr

Where:

*4.95 lbs VOC/gallon, as applied = maximum VOC content of any coating that can be applied in one hour (per permittee's application)

b. Emissions Limitation:

VOC emissions shall not exceed 53.74 tons per year.

Applicable Compliance Method:

Compliance with the annual VOC emissions limitation shall be demonstrated based on the following calculation:

VOC (tons/yr) = maximum coating VOC content*, as applied, in lbsVOC/gallon X maximum hourly coating use rate, in gallons/hr X hours/yr X 1 ton/2,000 pounds
= 4.09 lbs VOC/gallon X 3 gallons/hr X 8,760 hours/yr X 1 ton/2,000 lbs
= 53.74 tons/yr

Where:

*4.09 lbs VOC/gallon, as applied = maximum VOC content of any coating that can be applied 8,760 hours per year (per permitee's application)

c. Emissions Limitations:

VOC emissions from coatings and cleanup material use at the facility (emissions units K001 and K002) shall not exceed 99.0 tons based on a rolling, 12-month summation.

Emissions of any single hazardous air pollutant (HAP) from coatings and cleanup material use at the facility (emissions units K001 and K002) shall not exceed 9.9 tons based on a rolling, 12-month summation.

Total HAP emissions from coatings and cleanup material use at the facility (emissions units K001 and K002) shall not exceed 24.9 tons based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with these emissions limitations shall be demonstrated by the recordkeeping in d)(1).

d. Emissions Limitation:

The VOC content of the coatings employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents, as a daily volume-weighted average.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by the recordkeeping in d)(2).

e. Emissions Limitations:

PE shall not exceed 0.13 lb/hr and 0.58 ton per year.
PE shall not exceed 0.551 pound per hour.

Applicable Compliance Methods:

Compliance with the short-term PE limitation shall be demonstrated based on the following calculation:

PE (lb/hr) = maximum coating solids content, as applied, in lbs/gallon X maximum hourly coating use rate, in gallons/hr X minimum % transfer efficiency X minimum % control efficiency
= 7.36 lbs solids/gallon X 3 gallons/hr X (1-0.70) X (1-0.98)
= 0.13 lb/hr

Where:

7.36 lbs solids/gallon = maximum solids content of any coating (per permitee's application);
70% = minimum transfer efficiency of HVLP spray guns(per permittee's application); and
98% = minimum control efficiency of particulate filters (per permittee's application)

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", and the procedures specified in OAC rule 3745 17 03(B)(10). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the annual PE limitation shall be demonstrated based on the following calculation:

PE (tons/yr) = maximum hourly PE rate X 8,760 hours/yr X 1 ton/2,000 lbs
= 0.13 lb/hr X 8,760 hours/yr X 1 ton/2,000 lbs
= 0.58 ton per year

f. Emissions Limitation:

No visible PE from any stack serving this emissions unit.

Applicable Compliance Method:

If required, visible PE shall be determined according to USEPA Method 22.

g. Emissions Limitation:

Visible PE from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible PE shall not exceed sixty percent opacity, as a six minute average, at any time.

Applicable Compliance Method:

If required, visible PE shall be determined according to USEPA Method 9.

g) Miscellaneous Requirements

(1) None.