



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

9/26/2013

Ms. Annie Tremblay  
Tremcar USA Inc.  
436 Twelfth Street NE  
Strasburg, OH 44680

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0679005013  
Permit Number: P0115092  
Permit Type: Initial Installation  
County: Tuscarawas

Certified Mail

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

Dear Permit Holder:

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

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

**How to appeal this permit**

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

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

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://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](http://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](http://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)385-8501 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-SEDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Tremcar USA Inc.**

|                |                      |
|----------------|----------------------|
| Facility ID:   | 0679005013           |
| Permit Number: | P0115092             |
| Permit Type:   | Initial Installation |
| Issued:        | 9/26/2013            |
| Effective:     | 9/26/2013            |
| Expiration:    | 9/26/2023            |





**Division of Air Pollution Control  
Permit-to-Install and Operate**

for  
Tremcar USA Inc.

**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. F001, Blast Booth .....  | 11 |
| 2. K001, Paint Booth.....   | 14 |





**Final Permit-to-Install and Operate**  
Tremcar USA Inc.  
**Permit Number:** P0115092  
**Facility ID:** 0679005013  
**Effective Date:** 9/26/2013

## Authorization

Facility ID: 0679005013  
Application Number(s): A0047955  
Permit Number: P0115092  
Permit Description: Installation and operating permit for a coating booth and an abrasive blast booth already installed  
Permit Type: Initial Installation  
Permit Fee: \$800.00  
Issue Date: 9/26/2013  
Effective Date: 9/26/2013  
Expiration Date: 9/26/2023  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Tremcar USA Inc.  
436 Twelfth Street NE  
Strasburg, OH 44680

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



**Final Permit-to-Install and Operate**

Tremcar USA Inc.

**Permit Number:** P0115092

**Facility ID:** 0679005013

**Effective Date:** 9/26/2013

## Authorization (continued)

Permit Number: P0115092

Permit Description: Installation and operating permit for a coating booth and an abrasive blast booth already installed

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

|                                   |                |
|-----------------------------------|----------------|
| <b>Emissions Unit ID:</b>         | <b>F001</b>    |
| Company Equipment ID:             | Blast Booth    |
| Superseded Permit Number:         |                |
| General Permit Category and Type: | Not Applicable |
| <b>Emissions Unit ID:</b>         | <b>K001</b>    |
| Company Equipment ID:             | Paint Booth    |
| Superseded Permit Number:         |                |
| General Permit Category and Type: | Not Applicable |



**Final Permit-to-Install and Operate**

Tremcar USA Inc.

**Permit Number:** P0115092

**Facility ID:** 0679005013

**Effective Date:** 9/26/2013

## **A. Standard Terms and Conditions**



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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

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

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

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



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

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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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



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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, 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<sup>1</sup> 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.

---

<sup>1</sup> 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.



**Final Permit-to-Install and Operate**

Tremcar USA Inc.

**Permit Number:** P0115092

**Facility ID:** 0679005013

**Effective Date:** 9/26/2013

## **B. Facility-Wide Terms and Conditions**



**Final Permit-to-Install and Operate**

Tremcar USA Inc.

**Permit Number:** P0115092

**Facility ID:** 0679005013

**Effective Date:** 9/26/2013

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



**Final Permit-to-Install and Operate**

Tremcar USA Inc.

**Permit Number:** P0115092

**Facility ID:** 0679005013

**Effective Date:** 9/26/2013

## **C. Emissions Unit Terms and Conditions**



**1. F001, Blast Booth**

**Operations, Property and/or Equipment Description:**

Abrasive blasting using garnet controlled with a building enclosure with a 55% control efficiency.

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

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

a. None.

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

a. None.

b) **Applicable Emissions Limitations and/or Control Requirements**

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

|    | Applicable Rules/Requirements                       | Applicable Emissions Limitations/Control Measures  |
|----|---|--|
| a. | OAC rule 3745-31-05(A)(3), as effective 11/30/01    | Fugitive particulate emissions (PE) shall 0.86 tons per year (TPY).<br><br>Fugitive PE shall not exceed 15% opacity, as a 3-minute average.<br><br>See b)(2)a. below.<br><br>Best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust.<br><br>See b)(2)c. below. |
| b. | OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06 | See b)(2)b. below.   |



(2) Additional Terms and Conditions

a. 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, these emission limits/control measures no longer apply.

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

The BAT requirements under OAC rule 3745-31-05(A) do not apply to the PM emissions from this air contaminant source since the uncontrolled potential to emit for PM emissions is less than 10 TPY.

c. Abrasive sandblasting operations shall occur only in the building enclosure and actions should be taken to reduce or minimize fugitive dust emissions from egress points in the enclosure.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and, when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from any points of egress, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. the total duration of any visible emissions incident; and
- c. any corrective actions taken to eliminate the visible emissions.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.



(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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.

(3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d) (1)above:

- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
- b. any corrective actions taken to eliminate the visible emissions.

f) Testing Requirements

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

a. Emissions Limitation:  
Fugitive PE shall 0.86 TPY.

Applicable Compliance Method:

Compliance with the fugitive PE TPY emissions limitation shall be demonstrated by the following one-time calculations based on the emissions factor in AP-42 Section 13.2.6 (10/97) for sand blasting at a 5 mph wind speed, a sand flow rate of 16.25 lbs/hr and a control efficiency of 55%:

$$\begin{aligned}
 \text{PE (TPY)} &= (\text{EF for abrasive blasting with sand @ 5 mph})(\text{sand flow rate})(8760 \text{ hrs/yr})(1 \text{ T}/2000 \text{ lbs}) \\
 &= (27 \text{ pounds}/1000 \text{ pounds abrasive})(16.25 \text{ lbs/hr})(1 - 0.55)(8760 \text{ hrs/yr})(1 \text{ T}/2000 \text{ lbs}) \\
 &= 0.86 \text{ TPY}
 \end{aligned}$$

b. Emissions Limitation:  
Fugitive PE shall not exceed 15% opacity, as a 3-minute average.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.



**2. K001, Paint Booth**

**Operations, Property and/or Equipment Description:**

Coating operations, including primer, topcoat, thinner and clean-up, enclosed by a paint booth controlled by a fabric filter with a 99% capture efficiency and a 95% control efficiency, coating no more than 1300 frames per year.

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. g) (1)

(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), as effective 11/30/01    | Fugitive PE from coating operations shall not exceed 0.011 lb/hr and 0.0071 TPY.<br><br>Stack PE from coating operations shall not exceed 0.053 lb/hr and 0.034 TPY.<br><br>Volatile organic compounds (VOC) emissions from coating operations shall not exceed 5.14 lbs/hr.<br><br>VOC emissions from coating operations and clean-up shall not exceed 5.8 TPY.<br><br>See b)(2)a. below. |
| b. | OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06 | See b)(2)b. below.   |
|    | OAC rule 3745-21-09(U)(1)(d)                        | The VOC content of the coatings  |



|    | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures   |
|----|-------------------------------|---|
|    |                               | employed shall not exceed 3.5 pounds per gallon (lbs/gal), excluding water and exempt solvents, as a daily volume-weighted average. |
| c. | OAC rule 3745-17-11(C)        | See c)(1) and c)(2) below.  |

(2) Additional Terms and Conditions

- a. 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, these emission limits/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of the OAC rule 3745-31-05 as part of the SIP.

The BAT requirements under OAC rule 3745-31-05(A) do not apply to the PM and VOC emissions from this air contaminant source since the uncontrolled potential to emit for PM and VOC emissions is less than 10 TPY.

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

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



- (2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

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

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



n

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

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.

- (7) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions unit K001, 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 total VOC emission rate from all coatings, in pounds or tons, i.e., the summation of the products of "b" times "d" for all coating materials employed;
  - g. the total VOC emission rate from all cleanup materials, in pounds or tons, i.e., the summation of the products of "c" times "e" for all cleanup materials employed; and
  - h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, the sum of "f" and "g".

These records shall be maintained for the purpose of determining annual VOC emissions for the emissions unit.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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.



f) Testing Requirements

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

a. Emissions Limitations:

Fugitive PE from coating operations shall not exceed 0.011 lb/hr and 0.0071 TPY.

Applicable Compliance Method:

The fugitive PE lb/hr and TPY emissions limitations were established by the following one-time calculations based on a maximum coating use rate of 1.5 gallons per hour (gal/hr) of primer and 1 gal/hr of topcoat, a maximum solids content of 0.74 lb/gal of primer and 0.68lb/gal of topcoat, a transfer efficiency of 40% and a capture efficiency of 99%.

$$\begin{aligned}
\text{PE (lb/hr)} &= [(\text{gal/hr primer use} \times \text{max solids content of primer}) + (\text{gal/hr topcoat use} \times \text{max solids content of topcoat})] \times (1 - \text{transfer efficiency}) \times (1 - \text{capture efficiency}) \\
&= [(1.5 \text{ gal/hr} \times 0.74\text{lb/gal}) + (1\text{gal/hr} \times 0.68\text{lb/gal})] \times (1-0.40) \times (1-0.99) \\
&= 0.011\text{lb/hr}
\end{aligned}$$

$$\begin{aligned}
\text{PE (TPY)} &= 0.011\text{lb/hr} \times 1300 \text{ hrs (or frames)/yr} \times 1 \text{ T/2,000 lbs} \\
&= 0.0071\text{TPY}
\end{aligned}$$

On-going compliance with the above emissions limitations will be demonstrated by the required recordkeeping.

b. Emissions Limitations:

Stack PE from coating operations shall not exceed 0.053 lb/hr and 0.034 TPY.

Applicable Compliance Method:

The fugitive PE lb/hr and TPY emissions limitations were established by the following one-time calculations based on a maximum coating use rate of 1.5gal/hr of primer and 1 gal/hr of topcoat, a maximum solids content of 0.74lb/gal of primer, a maximum solids content of 0.68lb/gal of topcoat, a transfer efficiency of 40%, a capture efficiency of 99% and a control efficiency of 95%.

$$\begin{aligned}
\text{PE (lb/hr)} &= [(\text{gal/hr primer use} \times \text{max solids content of primer}) + (\text{gal/hr topcoat use} \times \text{max solids content of topcoat})] \times (1 - \text{transfer efficiency}) \times (\text{capture efficiency}) \times (1 - \text{control efficiency}) \\
&= [(1.5 \text{ gal/hr} \times 0.74\text{lb/gal}) + (1\text{gal/hr} \times 0.68\text{lb/gal})] \times (1-0.40) \times (0.99) \times (1 - 95\%) \\
&= 0.053\text{lb/hr}
\end{aligned}$$

If required, hourly 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.

$$\begin{aligned}
 \text{PE (TPY)} &= 0.053\text{lb/hr} \times 1300 \text{ hrs (or frames)/yr} \times 1 \text{ T/2,000 lbs} \\
 &= 0.034\text{TPY}
 \end{aligned}$$

On-going compliance with the above emissions limitations will be demonstrated by the required recordkeeping.

c. Emissions Limitation:

VOC emissions from coating operations shall not exceed 5.14 lbs/hr.

Applicable Compliance Method:

The VOC lb/hr emissions limitation was established by the following one-time calculations based on the worst case maximum coating use rate of 1.5gal/hr of primer and 0.045 gal/hr of thinner, and the worst case maximum VOC content of 3.21lb/gal of primer and 7.17 lb/gal of thinner, or 3.33 lbs/gal, as applied.

$$\begin{aligned}
 \text{VOC (lb/hr)} &= (\text{gal/hr primer/thinner, as applied}) \times (\text{VOC content primer/thinner, as applied}) \\
 &= (1.545 \text{ gal/hr primer/thinner, as applied}) \times [(1.5 \text{ gal/hr primer} \times 3.21\text{lb/gal}) + (0.45 \text{ thinner} \times 7.17 \text{ lb/gal})] \\
 &= (1.545 \text{ gal/hr primer/thinner, as applied}) \times (3.33 \text{ lbsVOC/gal, as applied}) \\
 &= 5.14 \text{ lbs/hr VOC}
 \end{aligned}$$

d. Emissions Limitation:

VOC emissions from coating operations and clean-up shall not exceed 5.8 TPY.

Applicable Compliance Method:

The VOC TPY emissions limitation was established by the following one-time calculations based on the maximum coating use rate of 1.5gal/frame of primer, 1.0 gal/frame of topcoat, 0.09 gal/frame of thinner, and 0.5 gal/frame of clean-up, a maximum VOC content of 3.21lb/gal of primer, 3.28 lb/gal of topcoat, 7.17 lb/gal of thinner/clean-up, a 95% thinner reclamation rate and an inherent production limitation of 1300 frames coated per year.

$$\begin{aligned}
 \text{VOCprimer (TPY)} &= (\text{gal/frame}) \times (\text{lb/gal}) \times (\text{frames/yr}) \times (1 \text{ T/2000 lbs}) \\
 &= (1.5 \text{ gal/frame}) \times (3.21 \text{ lb/gal}) \times (1300 \text{ frames/yr}) \times (1 \text{ T/2000 lbs}) \\
 &= 3.13 \text{ TPY VOC}
 \end{aligned}$$

$$\text{VOCtopcoat (TPY)} = (\text{gal/frame}) \times (\text{lb/gal}) \times (\text{frames/yr}) \times (1 \text{ T/2000 lbs})$$



= (1 gal/frame) X (3.28 lb/gal) X (1300 frames/yr) X (1 T/2000 lbs)

= 2.13 TPY VOC

VOCthinning (TPY) = (gal/frame) X (lb/gal) X (frames/yr) X (1 T/2000 lbs)

= (0.09 gal/frame) X (7.17 lb/gal) X (1300 frames/yr) X (1 T/2000 lbs)

= 0.42 TPY VOC

VOCclean-up (TPY) = (gal/frame) X (lb/gal) X (frames/yr) X (1 - 0.95) X (1 T/2000 lbs)

= (0.5 gal/frame) X (7.17 lb/gal) X (1300 frames/yr) X (1 - 0.95) X (1 T/2000 lbs)

= 0.12 TPY VOC

VOCtotal = 3.13 + 2.13 + 0.42 + 0.12 = 5.8 TPY

On-going compliance with the above emissions limitations will be demonstrated by the required recordkeeping identified in d)(7).

e. Emissions Limitation:

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

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(6) of this permit.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745 114 01, will be less than 1.0 TPY. OAC Chapter 3745 31 requires a permittee to apply for and obtain a new or modified permit-to-install and operate (PTIO) prior to making a "modification" as defined by OAC rule 3745 31 01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 TPY may require the permittee to apply for and obtain a new PTIO.