



10/25/2013

Certified Mail

Pat Fleming
Howden North America Inc.
338 SOUTH BROADWAY
NEW PHILADELPHIA, OH 44663

Facility ID: 0679020075
Permit Number: P0109002
County: Tuscarawas

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Initial

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Times-Reporter. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501.

Sincerely,

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-SEDO; Pennsylvania; West Virginia

PUBLIC NOTICE
10/25/2013 Issuance of Draft Air Pollution Title V Permit

Howden North America Inc.
338 South Broadway,
New Philadelphia, OH 44663
Tuscarawas County

FACILITY DESC.: Industrial and Commercial Fan and Blower Manufacturing

PERMIT #: P0109002

PERMIT TYPE: Initial

PERMIT DESC: Initial Title V operating permit for a a fan and blower manufacturing facility

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Kimbra Reinbold, Ohio EPA DAPC, Southeast District Office, 2195 Front Street, Logan, OH 43138. Ph: (740)385-8501



Statement of Basis
 Howden North America Inc.
Permit Number: P0109002
Facility ID: 0679020075

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0679020075
Facility Name:	Howden North America Inc.
Facility Description:	Fan and blower manufacturing facility
Facility Address:	338 South Broadway, New Philadelphia, OH 44663
Permit #:	P0109002, Initial
This facility is subject to Title V because it is major for: <input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input type="checkbox"/> Carbon Monoxide <input checked="" type="checkbox"/> Volatile Organic Compounds <input type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Particulate Matter ≤ 10 microns <input checked="" type="checkbox"/> Single Hazardous Air Pollutant <input checked="" type="checkbox"/> Combined Hazardous Air Pollutants <input checked="" type="checkbox"/> Maximum Available Control Technology Standard(s)	

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes. There are six IEUs at this facility. All were confirmed to be de minimis or permit exempt. Only one (EU L001) has applicable requirements, and this EU has been listed in B.3.
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A



B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.2.	N	Y	EUs R004-R006 are subject to MACT Subpart M for miscellaneous metal parts finishing; B.2. identifies the applicability of this rule pursuant to EG 76.
B.3.	3745-77-07(A)(13)(a)	N	Insignificant EUs with applicable requirements are required to be included in the Title V permit; EU L001 is the only EU at the facility in this category.

C. Emissions Unit Terms and Conditions

Key:															
EU = emissions unit ID							ENF = did noncompliance issues drive the monitoring requirements?								
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)							R = record keeping requirements								
OR = operational restriction							Rp = reporting requirements								
M = monitoring requirements							ET = emission testing requirements (not including compliance method terms)								
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement							Misc = miscellaneous requirements								
EU(s)	Limitation(s)	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP	Other												
P014	Particulate emissions (PE) shall not exceed 2.31 pounds per hour and 10.14 tons per year.	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	Use of a baghouse rated at 0.03 gr/dscf; no issues with excess VEs or malfunctions of this control equipment so no testing is required based on EG 16 guidance.
P014	Visible PE shall not exceed 5% opacity as a 6-minute average.	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	Use of a baghouse rated at 0.03 gr/dscf. Per EG 65, daily VE checks are being used to demonstrate compliance with the VE limit.



P014	This emissions limitation is less stringent than the limitations listed under OAC rule 3745-31-05(A)(3).	OAC rule 3745-17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	Use of a baghouse rated at 0.03 gr/dscf. Instead of the rule-based limit of 20% opacity as a 6-minute average, a BAT VE limit of 5% opacity as a 6-minute average is being established as achievable based on the 95% control efficiency of the baghouse. Per EG 65, daily VE checks are being used to demonstrate compliance with the VE limit.
P014	This emissions limitation is less stringent than the limitations listed under OAC rule 3745-31-05(A)(3).	OAC rule 3745-17-11(B)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	Use of a baghouse rated at 0.03 gr/dscf. Instead of the rule-based limit of 7.49 lbs/hr, a BAT limit of 2.31 lbs/hr is being established. No issues with excess VEs or malfunctions of this control equipment so no testing is required based on EG 16 guidance.
R004, R005 and R006	Volatile organic compound (VOC) emissions from coating operations shall not exceed 31.85 pounds per hour and 11.63 tons per year.	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	Compliance with these emissions limitations are based upon a maximum coating VOC content of 6.37 lbs/gallon and no more than 5 gallons per hour or 10 gallons per day of coating use per booth as demonstrated by one-time



Statement of Basis
 Howden North America Inc.
Permit Number: P0109002
Facility ID: 0679020075

																calculations.
R004, R005 and R006	VOC emissions from coating and cleanup operations in emissions units R004, R005 and R006, combined, shall not exceed 35.40 tons per rolling, 12-month period.	OAC rules 3745-31-05(D) and 3745-21-09(U)(2)(e)(iii)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	N	Compliance with these emissions limitations are based upon a maximum coating VOC content of 6.37 lbs/gallon and no more than 5 gallons per hour or 10 gallons per day of coating use per booth as demonstrated by recordkeeping in d)(3)d. (EU R004) and d)(7)d. (EUs R005 and R006).
R004	Particulate emissions (PE) shall not exceed 2.12 pounds per hour and 0.77 ton per year.	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	N	Use of dry particulate filters with a 90% control efficiency. No testing is required to demonstrate compliance with the mass emissions limits for spray booths controlled with dry particulate filters.
R004	There shall be no visible PE from the stacks serving this emissions unit.	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	N	N	N	Y	N	N	N	N	Use of dry particulate filters with a 90% control efficiency. Emissions unit is a spray booth equipped with properly maintained filters so no VE checks are required.
R005 and R006	Particulate emissions (PE) shall not exceed 2.12 pounds per hour and 0.77 ton per year.	N	OAC 3745-31-05(A)(3), as effective 11/30/01	N	Y	Y	N	N	Y	N	Y	N	N	N	N	Use of dry particulate filters with a 90% control efficiency and repair and operation of the particulate filter system in accordance with manufacturer's recommendations. No testing is required to



Statement of Basis
 Howden North America Inc.
Permit Number: P0109002
Facility ID: 0679020075

																	demonstrate compliance with the mass emissions limits for spray booths controlled with dry particulate filters or the work practice requirements in OAC rule 3745-17-11(C).
R005 and R006	There shall be no visible PE from the stacks serving this emissions unit.	N	OAC 3745-31-05(A)(3), as effective 11/30/01	N	Y	Y	N	N	N	N	Y	N	N	N			Use of dry particulate filters with a 90% control efficiency and repair and operation of the particulate filter system in accordance with manufacturer's recommendations. Emissions unit is a spray booth equipped with properly maintained filters so no VE checks are required.
R005 and R006	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. Permit to Install P0109321 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available	N	OAC 3745-31-05(A)(3)(b), as effective 12/01/06	N	N	Y	N	N	Y	N	Y	N	N	N			Use of dry particulate filters with a 90% control efficiency and repair and operation of the particulate filter system in accordance with manufacturer's recommendations.



	<p>Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):</p> <p>i. maximum coating use rate of 3,650 gallons per year; ii. use of spray equipment with a 60% transfer efficiency; iii. controlled with a partial enclosure with a 100% capture efficiency and dry filters with a 90% control efficiency (overall control of 90%) installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s); and iv. PE shall not exceed 0.77 ton per year.</p>														
R004	<p>This emissions limitation is less stringent than the limitations listed under OAC rule 3745-31-05(A)(3).</p>	OAC rule 3745-17-07(A)	N	N	Y	Y	N	N	N	N	Y	N	N	N	<p>Use of dry particulate filters with a 90% control efficiency. Emissions unit is a spray booth equipped with properly maintained filters so no VE checks are required.</p>
R004	<p>This emissions limitation is less stringent than the limitations listed under OAC rule</p>	OAC rule 3745-17-11(B)	N	N	Y	Y	N	N	N	N	Y	N	N	N	<p>Use of dry particulate filters with a 90% control efficiency. No testing is required to demonstrate compliance with the</p>



Statement of Basis
 Howden North America Inc.
Permit Number: P0109002
Facility ID: 0679020075

	3745-31-05(A)(3).															mass emissions limits for spray booths controlled with dry particulate filters.
R005 and R006	See c)(1) and (2) below.	OAC rule 3745-17-11(C)	N	N	Y	Y	N	N	N	N	Y	N	N	N	N	Use of dry particulate filters with a 90% control efficiency and repair and operation of the particulate filter system in accordance with manufacturer's recommendations. No testing is required to demonstrate compliance with the work practice requirements in OAC rule 3745-17-11(C).
R004, R005 and R006	The permittee shall not employ more than ten gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.	OAC rule 3745-21-09(U)(2)(e)(iii)	N	N	N	Y	N	N	Y	N	Y	N	N	N	N	Compliance is demonstrated by the recordkeeping requirements in d)(2) for EU R004 and d)(6) for EUs R005 and R006 in lieu of testing.
R004, R005 and R006	Organic hazardous air pollutant (HAP) emissions from metal parts coating operations in this emissions unit shall not exceed: 0.31 kg/liter or 2.6 lbs/gallon of coating solids used during	N	40 CFR Part 63, Subpart M	N	N	Y	N	N	Y	N	Y	N	N	N	N	Compliance is demonstrated by the recordkeeping requirements in d)(5) for R004 and d)(9) for R005 and R006 in lieu of testing.



	<p>each rolling, 12-month period when general use coatings are used.</p> <p>[40 CFR 63.3890(b)(1)]</p> <p>3.3 kg/liter or 27.5 lbs/gallon of coating solids used during each rolling, 12-month period when high performance coatings are used.</p> <p>[40 CFR 63.3890(b)(2)]</p> <p>1.5 kg/liter or 12.4 lbs/gallon of coating solids used during each rolling, 12-month period when extreme performance fluoropolymer coatings are used.</p> <p>[40 CFR 63.3890(b)(5)]</p> <p>The permittee shall be subject to the requirements and limitations of 40 CFR Part 63, Subpart M, upon the date of initial startup of the affected source. For any coating operation that is meeting the emission limitations in 40 CFR 63.3890 by using the "without add-on control" option, the permittee shall maintain the emissions unit(s) in</p>														
--	---	--	--	--	--	--	--	--	--	--	--	--	--	--	--



Statement of Basis
 Howden North America Inc.
Permit Number: P0109002
Facility ID: 0679020075

	compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis following the initial compliance period, i.e., the mass average organic HAP emission rate shall be calculated each month as required in 40 CFR 63.3951 and 63.3952.															
R004, R005 and R006	Table 2 to Subpart Mmmm of Part 63 – Applicability of General Provisions to Subpart Mmmm of Part 63 shows which parts of the General Provisions in 40 CFR 63.1-15 apply.	N	40 CFR Part 63, Subpart A	N	N	Y	N	N	Y	N	Y	N	N	N	N	Compliance is demonstrated by the reporting requirements in e)(5). No testing is required.
R004, R005 and R006		OAC rule 3745-114-01	N	Y	N	N	N	N	N	N	N	N	N	N	N	Organic air toxics are addressed by the MACT Subpart Mmmm standards. Inorganic air toxics are all emitted at less than one ton per year, so modeling for inorganic air toxics is not required in accordance with EG 70.



DRAFT

**Division of Air Pollution Control
Title V Permit
for
Howden North America Inc.**

Facility ID:	0679020075
Permit Number:	P0109002
Permit Type:	Initial
Issued:	10/25/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Howden North America Inc.

Table of Contents

Authorization	1
A. Standard Terms and Conditions	2
1. Federally Enforceable Standard Terms and Conditions	3
2. Monitoring and Related Record Keeping and Reporting Requirements.....	3
3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance.....	6
4. Risk Management Plans	7
5. Title IV Provisions	7
6. Severability Clause	7
7. General Requirements	7
8. Fees.....	8
9. Marketable Permit Programs.....	8
10. Reasonably Anticipated Operating Scenarios	9
11. Reopening for Cause	9
12. Federal and State Enforceability	9
13. Compliance Requirements	9
14. Permit Shield	11
15. Operational Flexibility.....	11
16. Emergencies.....	12
17. Off-Permit Changes	12
18. Compliance Method Requirements	12
19. Insignificant Activities or Emissions Levels.....	13
20. Permit to Install Requirement.....	13
21. Air Pollution Nuisance	13
22. Permanent Shutdown of an Emissions Unit	13
23. Title VI Provisions	13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only	14
25. Records Retention Requirements Under State Law Only.....	14
26. Inspections and Information Requests	14
27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements.....	15
28. Permit Transfers	15



29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	15
30. Submitting Documents Required by this Permit	16
B. Facility-Wide Terms and Conditions.....	17
C. Emissions Unit Terms and Conditions	19
1. P014, Structural Shop Roto Blast.....	20
2. R004, Large Paint Booth.....	24
3. Emissions Unit Group - Small Paint Booths: R005, R006.....	34



Draft Title V Permit
Howden North America Inc.
Permit Number: P0109002
Facility ID: 0679020075

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0679020075
Facility Description:
Application Number(s): A0042937, A0043731
Permit Number: P0109002
Permit Description: Initial Title V operating permit for a a fan and blower manufacturing facility
Permit Type: Initial
Issue Date: 10/25/2013
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number:

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

Howden North America Inc.
338 South Broadway
New Philadelphia, OH 44663

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 a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Southeast District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Draft Title V Permit
Howden North America Inc.
Permit Number: P0109002
Facility ID: 0679020075
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))



c) The permittee shall submit required reports in the following manner:

- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

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

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the



probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Southeast District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

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

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Southeast District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally



enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Southeast District Office unless otherwise specified.

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

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

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



4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.



- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))



10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements



- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Southeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms



and conditions with which there has been continuous compliance throughout the year are not separately identified.

- b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Southeast District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Southeast District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))



16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)



19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

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

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

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

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions



If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southeast District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention Requirements Under State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports



pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Southeast District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or



- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Southeast District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



Draft Title V Permit
Howden North America Inc.
Permit Number: P0109002
Facility ID: 0679020075
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Effective Date: To be entered upon final issuance

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

a) None.

2. Emissions units R004, R005 and R006 contained in this permit is subject to 40 CFR Part 63, Subpart M. The complete MACT requirements, including the MACT General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulation (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

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

3. The following insignificant emissions units located at this facility are subject to one or more applicable requirements (as defined in OAC rule 3745-77-01(H)):

EU ID	Operations, Property and/or Equipment Description
L001	Parts Washer – Mine Fan Building (OAC rules 3745-31-03(A)(1)(w) and 3745-21-09(O))

Each insignificant emissions unit at this facility must comply with all applicable State and Federal regulations, as well as any emissions limitations and/or control requirements contained within a permit-to-install for that emissions unit. Insignificant emissions units listed above that are not subject to specific permit-to-install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

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



Draft Title V Permit
Howden North America Inc.
Permit Number: P0109002
Facility ID: 0679020075
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P014, Structural Shop Roto Blast

Operations, Property and/or Equipment Description:

PagnbornRotoblast, a steel shot blasting cabinet with 100% of particulate emissions vented to a fabric filter baghouse with a maximum outlet concentration of 0.03 gr PE/dscf; emissions unit installed in 1977

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #06-311 issued in April 1977)	Particulate emissions (PE) shall not exceed 2.31 pounds per hour and 10.14 tons per year. Visible PE shall not exceed 5% opacity as a 6-minute average. See c)(1) below. The requirements of this rule include compliance with OAC rules 3745-17-07(A) and 3745-17-11(B).
b.	OAC rule 3745-17-07(A)	This emissions limitation is less stringent than the limitations listed under OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11(B)	This emissions limitation is less stringent than the limitations listed under OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. None.



c) Operational Restrictions

- (1) The emissions from the shot blasting operation shall be vented to the fabric filter baghouse at all times the emissions unit is in operation.

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

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 particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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

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

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

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 semiannual written reports that:
 - a. identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and



- b. describe any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

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. Emissions Limitations:
PE shall not exceed 2.31 pounds per hour and 10.14 tons per year.

Applicable Compliance Method:
Compliance with the pounds per hour emissions limitation was determined based on the following one-time calculation:

$$\begin{aligned} \text{PE (lbs/hr)} &= (\text{design outlet concentration (gr/dscf)}) \times (\text{flow rate of} \\ &\quad \text{cartridge filter baghouse (dscf/min)}) \times (\text{lb/7,000 gr}) \times (60 \\ &\quad \text{min/hour}) \\ &= 0.03 \text{ gr/dscf} \times 9,000 \text{ dscf/min} \times 1 \text{ lb/7,000 gr} \times 60 \text{ min/hr} \\ &= 2.31 \text{ lbs PE/hr} \end{aligned}$$

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". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the annual emissions limitation shall be demonstrated by the following calculation:

$$\begin{aligned} \text{PE (tons/yr)} &= 2.31 \text{ lbs PE/hr} \times 8,760 \text{ hrs/yr} \times 1 \text{ ton/2,000 lbs} \\ &= 10.14 \text{ tons/yr} \end{aligned}$$

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

- b. Emissions Limitation:
Visible PE shall not exceed 5% opacity as a 6-minute average.

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

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



Draft Title V Permit
Howden North America Inc.
Permit Number: P0109002
Facility ID: 0679020075

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



2. R004, Large Paint Booth

Operations, Property and/or Equipment Description:

DevillbisDyna-Clean downdraft paint booth controlled with dry particulate filters with a 90% control efficiency and used to coat miscellaneous metal parts with conventional spray guns; maximum coatings usage rate of 3,650 gallons per year and a facility-wide maximum cleanup solvent usage rate of 150 gallons per year; emissions unit installed in 1976

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI # P0109321 issued February 6, 2012)	<p>Volatile organic compound (VOC) emissions from coating operations shall not exceed 31.85 pounds per hour and 11.63 tons per year.</p> <p>Particulate emissions (PE) shall not exceed 2.12 pounds per hour and 0.77 ton per year.</p> <p>There shall be no visible PE from the stacks serving this emissions unit.</p> <p>See c)(1) and (2) below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B).</p>
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD major source status for VOC)	<p>VOC emissions from coating and cleanup operations in emissions units R004, R005 and R006, combined, shall not exceed 35.40 tons per rolling, 12-month period.</p> <p>See c)(2) below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rule 3745-21-09(U)(2)(e)(iii).
c.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-11(B)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)a. below.
f.	40 CFR Part 63, Subpart Mmmm (40 CFR 63.3880–3981) [In accordance with 40 CFR 63.3881(a) and (b), this emissions unit is an existing miscellaneous metal parts or products surface coating source that uses 250 gallons or more per year of coatings that contain HAPs at a major source of HAP emissions and is subject to the emissions limitations and control measures specified in this section.]	Organic hazardous air pollutant (HAP) emissions from metal parts coating operations in this emissions unit shall not exceed: 0.31 kg/liter or 2.6 lbs/gallon of coating solids used during each rolling, 12-month period when general use coatings are used. [40 CFR 63.3890(b)(1)] 3.3 kg/liter or 27.5 lbs/gallon of coating solids used during each rolling, 12-month period when high performance coatings are used. [40 CFR 63.3890(b)(2)] 1.5 kg/liter or 12.4 lbs/gallon of coating solids used during each rolling, 12-month period when extreme performance fluoropolymer coatings are used. [40 CFR 63.3890(b)(5)] See b)(2)b. and c. below.
g.	40 CFR 63.1-16 (40 CFR 63.3901)	Table 2 to Subpart Mmmm of Part 63 – Applicability of General Provisions to Subpart Mmmm of Part 63 shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The permittee shall not employ more than ten gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.



[Authority for term: OAC rule 3745-21-09(U)(2)(e)(iii)]

- b. The permittee shall be subject to the requirements and limitations of 40 CFR Part 63, Subpart M, three years after January 2, 2004 (January 2, 2007).

[Authority for term: 40 CFR Part 60, Subpart M]

- c. For any coating operation that is meeting the emission limitations in 40 CFR 63.3890 by using the "without add-on control" option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis following the initial compliance period, i.e., the mass average organic HAP emission rate shall be calculated each month as required in 40 CFR 63.3951 and 63.3952.

[Authority for term: 40 CFR Part 60, Subpart M]

c) Operational Restrictions

- (1) All exhaust from the spray booth shall pass through the dry filters with a control efficiency of at least 90% whenever this emissions unit is in operation.

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

- (2) The VOC content of coatings shall not exceed 6.37 pounds per gallon of coating, as applied, excluding water and exempt solvents.

[Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.

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

- (2) The permittee shall collect and record the following information each day for this emissions unit:

- a. The name and identification number of each metal coating employed.
- b. The number of gallons of each metal coating employed.
- c. The total number of gallons of all the metal coatings employed.

[Authority for term: OAC rules 3745-21-09(U)(2)(e)(iii) and 3745-77-07(A)(3)]

- (3) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units R004, R005 and R006, combined:



- a. the number of gallons of each coating and cleanup material employed during the month;
- b. the maximum VOC content of each coating and cleanup material employed, in pounds per gallon;
- c. the total VOC emissions from all coatings and cleanup materials employed [the sum of (a. times b.) for all coatings plus (a. times b.) for all cleanup materials] divided by 2,000, in tons; and
- d. the rolling, 12-month summation of the total VOC emissions i.e., the summation of the total VOC emissions, as recorded in c. above, for the present month plus the previous 11 months of operation, in ton(s).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

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

- (4) The permittee, having chosen to demonstrate compliance with the coating content limitation in c)(2) through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

- a. the name and identification number of each coating, as applied; and
- b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

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

where:

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

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

V_S = 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.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific “gallons/year” and/or “tons/year” limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

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

- (5) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart M, including the following sections:

63.3930(a)	Maintain copies of each notification and report submitted
63.3930(b)	Maintain information provided by material suppliers or manufacturers and copies of any coating test data.
63.3930(c)(3)	Maintain calculations of the total mass of organic HAP emissions for the coatings, thinners and/or other additives and cleaning materials used each month, the mass organic HAP in waste materials (if applicable), the total volume of coatings solids used each month and each 12-month organic HAP emission rate for each compliance period.
63.3930(d)	Maintain records of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period.
63.3930(e)	Maintain records of the mass fraction of organic HAP for each coating, thinner and/or other additive and cleaning material used during each compliance period.
63.3930(f)	Maintain records of the volume fraction of coating solids for each coating used during each compliance period
63.3930(g)	Maintain records of the density of each coating, thinner and/or other additive and



Effective Date: To be entered upon final issuance

	cleaning material used during each compliance period.
63.3930(h)	Maintain records of the organic HAP content of waste materials disposed.
63.3930(j)	Maintain records of date, time and duration of each deviation.
63.3950	Conduct initial compliance demonstration.
63.3951	Demonstrate initial compliance with emissions limitation.
63.3952	Demonstrate continuous compliance with emissions limitation.

[Authority for term: 40 CFR Part 60, Subpart M]]

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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. 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.

[Authority for term: OAC rules 3745-21-09(U)(2)(e)(iii) and 3745-77-07(A)(3)]

- (3) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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

- (4) The permittee shall notify the Director in writing of any daily record showing that the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southeast District Office (SEDO) within 30 days after the event occurs.

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



Effective Date: To be entered upon final issuance

- (5) The permittee shall submit notifications and reports to the appropriate Ohio EPA District office as required pursuant to 40 CFR Part 63, Subpart MMMM, per the following sections:

63.3910(b)	Initial notification
63.3910(c), 63.3950 and 63.9(h)	Notification of compliance status
63.3920(a)	Semi-annual excess emissions/summary reports

[Authority for term: 40 CFR Part 60, Subpart MMMM]

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. Emissions Limitations:

VOC emissions from coating operations shall not exceed 31.85 pounds per hour and 11.63 tons per year.

Applicable Compliance Method:

Compliance with the emissions limitations was determined based on the following one-time calculations based on a maximum coating use rate of five gallons per hour and 3,650 gallons per year and a maximum coating VOC content of 6.37 pounds per gallon:

$$\begin{aligned} \text{VOC (lbs/hr)} &= 5 \text{ gal/hour} \times 6.37 \text{ pounds VOC/gal} \\ &= 31.85 \text{ pounds per hour} \end{aligned}$$

$$\begin{aligned} \text{VOC (tons/yr)} &= 3,650 \text{ gal/yr} \times 6.37 \text{ pounds VOC/gal} \times 1 \text{ ton}/2,000 \text{ pounds} \\ &= 11.63 \text{ tons per year} \end{aligned}$$

If required, VOC emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

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

b. Emissions Limitation:

VOC emissions from coating and cleanup operations in emissions units R004, R005 and R006, combined, shall not exceed 35.40 tons per rolling, 12-month period.



Applicable Compliance Method:

Compliance shall be based upon a summation of VOC emissions from emissions units R004, R005 and R006 determined in accordance with the record keeping specified in d)(3)d. of this permit.

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

c. Emissions Limitation:

The permittee shall not employ more than ten gallons of coating per day for the miscellaneous metal parts and products coating line.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2)c. of this permit.

[Authority for term: OAC rules 3745-21-09(U)(2)(e)(iii) and 3745-77-07(A)(3)]

d. Emissions Limitation:

The VOC content of coatings shall not exceed 6.37 pounds per gallon of coating, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(4) of this permit.

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

e. Emissions Limitations:

PE shall not exceed 2.12 pounds per hour and 0.77 ton per year.

Applicable Compliance Method:

Compliance with the emissions limitations was determined based on the following one-time calculations based on a maximum coating use rates of five gallons per hour and 3,650 gallons per year, a maximum solids content of 10.59 pounds per gallon, a transfer efficiency of 60%, a capture efficiency of 100% and a control efficiency of 90%:

$$\begin{aligned}
 \text{PE (lbs/hr)} &= \text{gallons per hour coating use} \times \text{maximum solids content of coating} \times \text{transfer efficiency} \times \text{capture efficiency} \times \text{control efficiency} \\
 &= 5 \text{ gallons/hr} \times 10.59 \text{ pounds solids/gal} \times (1-0.60) \times 100\% \times (1-0.90) \\
 &= 2.12 \text{ pounds per hour}
 \end{aligned}$$

If required, hourly PE 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.



Effective Date: To be entered upon final issuance

$$\begin{aligned}
\text{PE (tons/yr)} &= \text{gallons per year coating use} \times \text{maximum solids content of coating} \times \text{transfer efficiency} \times \text{capture efficiency} \times \text{control efficiency} \times 1 \text{ ton}/2,000 \text{ pounds} \\
&= 3,650 \text{ gallons/yr} \times 10.59 \text{ pounds solids/gal} \times (1-0.60) \times 100\% \times (1-0.90) \times 1 \text{ ton}/2,000 \text{ lbs} \\
&= 0.77 \text{ tons per year}
\end{aligned}$$

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

- f. Emissions Limitation:
There shall be no visible PE from the stacks serving this emissions unit.

Applicable Compliance Method:
If required, visible particulate emissions shall be determined according to USEPA Method 22.

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

- g. Emissions Limitation:
Organic hazardous air pollutant (HAP) emissions from metal parts coating operations in this emissions unit shall not exceed: 0.31 kg/liter or 2.6 lbs/gallon of coating solids used during each rolling, 12-month period when general use coatings are used, 3.3 kgs/liter or 27.5 lbs/gallon of coating solids used during each rolling, 12-month period when high performance coatings are used and 1.5 kgs/liter or 12.4 lbs/gallon of coating solids used during each rolling, 12-month period when extreme performance fluoropolymer coatings are used.

Applicable Compliance Method:
Compliance with the emissions limitations shall be demonstrated by the recordkeeping specified in d)(5) of this permit and as allowed in 40 CFR 63.3890(c) for operations where more than one of the subcategory emissions limits apply.

[Authority for term: 40 CFR Part 63, Subpart M and 3745-77-07(A)(3)]

- (2) Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

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

g) Miscellaneous Requirements

- (1) Modeling for organic toxic air contaminants was not required pursuant to Engineering Guide #70, Question 3 because organic HAP emissions from this emissions unit are subject to 40 CFR Part 63 Subpart M. Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary for inorganic air toxic contaminants because the emissions unit's maximum annual emissions for each inorganic toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit-to-install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the



Draft Title V Permit
Howden North America Inc.
Permit Number: P0109002
Facility ID: 0679020075

Effective Date: To be entered upon final issuance

composition of the materials, or use of new materials, that would cause the emissions of any inorganic toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit-to-install.

[Authority for term: OAC rules 3745-114-01 and 3745-77-07(A)(3)]



3. Emissions Unit Group - Small Paint Booths: R005, R006

EU ID	Operations, Property and/or Equipment Description
R005	Small Paint Booth West
R006	Small Paint Booth East

Col-Met Model # 104-1412-14-02-01 side downdraft paint booths controlled with dry particulate filters with a 90% control efficiency and used to coat miscellaneous metal parts with conventional spray guns and a shared 2.5 million BTU/hour natural gas fired flash/drying oven; maximum coatings usage rate of 3,650 gallons per year per booth and facility-wide maximum cleanup solvent usage rate of 150 gallons per year; emissions units installed in April of 2009

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) g)(1)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI # P0109321 issued February 6, 2012)	<p>Volatile organic compound (VOC) emissions from coating operations shall not exceed 31.85 pounds per hour and 11.63 tons per year.</p> <p>See c)(1) below.</p>
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD major source status for VOC)	<p>VOC emissions from coating and cleanup operations in emissions units R004, R005 and R006, combined, shall not exceed 35.40 tons per rolling, 12-month period.</p> <p>See c)(3) below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(iii).</p>
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<p>Particulate emissions (PE) shall not exceed 2.12 pounds per hour and 0.77 ton per year.</p> <p>There shall be no visible PE from the stacks serving this emissions unit.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>See b)(2)a. below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(C).</p>
d.	<p>OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06 (Voluntary restriction to avoid BAT requirements for PE)</p>	<p>See b)(2)b. below.</p>
e.	<p>OAC rule 3745-17-11(C)</p>	<p>See c)(1) and (2) below.</p>
f.	<p>OAC rule 3745-21-09(U)(2)(e)(iii)</p>	<p>See b)(2)c. below.</p>
g.	<p>40 CFR Part 63, Subpart M (40 CFR 63.3880–3981)</p> <p>[In accordance with 40 CFR 63.3881(a) and (b), this emissions unit is an existing miscellaneous metal parts or products surface coating source that uses 250 gallons or more per year of coatings that contain HAPs at a major source of HAP emissions and is subject to the emissions limitations and control measures specified in this section.]</p>	<p>Organic hazardous air pollutant (HAP) emissions from metal parts coating operations in this emissions unit shall not exceed:</p> <p>0.31 kg/liter or 2.6 lbs/gallon of coating solids used during each rolling, 12-month period when general use coatings are used. [40 CFR 63.3890(b)(1)]</p> <p>3.3 kg/liter or 27.5 lbs/gallon of coating solids used during each rolling, 12-month period when high performance coatings are used. [40 CFR 63.3890(b)(2)]</p> <p>1.5 kg/liter or 12.4 lbs/gallon of coating solids used during each rolling, 12-month period when extreme performance fluoropolymer coatings are used. [40 CFR 63.3890(b)(5)]</p> <p>See b)(2)d. and e. below.</p>
h.	<p>40 CFR 63.1-16 (40 CFR 63.3901)</p>	<p>Table 2 to Subpart M of Part 63 – Applicability of General Provisions to Subpart M of Part 63 shows which parts of the General Provisions in 40 CFR 63.1-15 apply.</p>

(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, then these emission limits/control measures no longer apply.

[Authority for term: OAC rule 3745-31-05(A)(3), as effective 11/30/01]

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

Permit to Install P0109321 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. maximum coating use rate of 3,650 gallons per year;
- ii. use of spray equipment with a 60% transfer efficiency;
- iii. controlled with a partial enclosure with a 100% capture efficiency and dry filters with a 90% control efficiency (overall control of 90%) installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s); and
- iv. PE shall not exceed 0.77 ton per year.

[Authority for term: OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06]

- c. The permittee shall not employ more than ten gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.

[Authority for term: OAC rule 3745-21-09(U)(2)(e)(iii)]

- d. The permittee shall be subject to the requirements and limitations of 40 CFR Part 63, Subpart M, upon the date of initial startup of the affected source.

[Authority for term: 40 CFR Part 60, Subpart M]

- e. For any coating operation that is meeting the emission limitations in 40 CFR 63.3890 by using the "without add-on control" option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis following the initial compliance period, i.e., the mass average organic HAP emission rate shall be calculated each month as required in 40 CFR 63.3951 and 63.3952.



[Authority for term: 40 CFR Part 60, Subpart M]

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system with a control efficiency of at least 90% 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.

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

- (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.

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

- (3) The VOC content of coatings shall not exceed 6.37 pounds per gallon of coating, as applied, excluding water and exempt solvents.

[Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(A)(1)]

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.

[Authority for term: OAC rules 3745-31-05(A), 3745-17-11(C) and 3745-77-07(A)(3)]

- (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.

[Authority for term: OAC rules 3745-31-05(A), 3745-17-11(C) and 3745-77-07(A)(3)]

- (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.

[Authority for term: OAC rules 3745-31-05(A), 3745-17-11(C) and 3745-77-07(A)(3)]



- (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.

[Authority for term: OAC rules 3745-31-05(A), 3745-17-11(C) and 3745-77-07(A)(3)]

- (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.

[Authority for term: OAC rules 3745-31-05(A), 3745-17-11(C) and 3745-77-07(A)(3)]

- (6) The permittee shall collect and record the following information each day for this emissions unit:
- a. The name and identification number of each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The total number of gallons of all the coatings employed.

[Authority for term: OAC rules 3745-21-09(U)(2)(e)(iii) and 3745-77-07(A)(3)]

- (7) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units R004, R005 and R006, combined:
- a. the number of gallons of each coating and cleanup material employed during the month;
 - b. the maximum VOC content of each coating and cleanup material employed, in pounds per gallon;
 - c. the total VOC emissions from all coatings and cleanup materials employed [the sum of (a. times b.) for all coatings plus (a. times b.) for all cleanup materials] divided by 2,000, in tons; and



- d. the rolling, 12-month summation of the total VOC emissions i.e., the summation of the total VOC emissions, as recorded in c. above, for the present month plus the previous 11 months of operation, in ton(s).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

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

- (8) The permittee, having chosen to demonstrate compliance with the coating content limitation in c)(3) through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

- a. the name and identification number of each coating, as applied; and
- b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

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

where:

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

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

V_S = 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.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific “gallons/year” and/or “tons/year” limitation in a Permit-to-install, where the above-mentioned information shall be



maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

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

- (9) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart M, including the following sections:

63.3930(a)	Maintain copies of each notification and report submitted
63.3930(b)	Maintain information provided by material suppliers or manufacturers and copies of any coating test data.
63.3930(c)(3)	Maintain calculations of the total mass of organic HAP emissions for the coatings, thinners and/or other additives and cleaning materials used each month, the mass organic HAP in waste materials (if applicable), the total volume of coatings solids used each month and each 12-month organic HAP emission rate for each compliance period.
63.3930(d)	Maintain records of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period.
63.3930(e)	Maintain records of the mass fraction of organic HAP for each coating, thinner and/or other additive and cleaning material used during each compliance period.
63.3930(f)	Maintain records of the volume fraction of coating solids for each coating used during each compliance period
63.3930(g)	Maintain records of the density of each coating, thinner and/or other additive and cleaning material used during each compliance period.
63.3930(h)	Maintain records of the organic HAP content of waste materials disposed.
63.3930(j)	Maintain records of date, time and duration



	of each deviation.
63.3950	Conduct initial compliance demonstration.
63.3951	Demonstrate initial compliance with emissions limitation.
63.3952	Demonstrate continuous compliance with emissions limitation.

[Authority for term: 40 CFR Part 60, Subpart Mmmm]

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 the following:
 - a. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

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

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

- (3) 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 coating line employs more than the applicable maximum daily coating usage limit. 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.

[Authority for term: OAC rules 3745-21-09(U)(2)(e)(iii) and 3745-77-07(A)(3)]

- (4) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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

- (5) The permittee shall submit notifications and reports to the appropriate Ohio EPA District office as required pursuant to 40 CFR Part 63, Subpart Mmmm, per the following sections:



63.3910(b)	Initial notification
63.3910(c), 63.3950 and 63.9(h)	Notification of compliance status
63.3920(a)	Semi-annual excess emissions/summary reports

[Authority for term: 40 CFR Part 60, Subpart M]

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. Emissions Limitations:

VOC emissions from coating operations shall not exceed 31.85 pounds per hour and 11.63 tons per year.

Applicable Compliance Method:

Compliance with the emissions limitations was determined based on the following one-time calculations based on a maximum coating use rate of five gallons per hour and 3,650 gallons per year and a maximum coating VOC content of 6.37 pounds per gallon.

$$\begin{aligned} \text{VOC (lbs/hr)} &= 5 \text{ gal/hour} \times 6.37 \text{ pounds VOC/gal} \\ &= 31.85 \text{ pounds per hour} \end{aligned}$$

$$\begin{aligned} \text{VOC (tons/yr)} &= 3,650 \text{ gal/yr} \times 6.37 \text{ pounds VOC/gal} \times 1 \text{ ton}/2,000 \text{ pounds} \\ &= 11.63 \text{ tons per year} \end{aligned}$$

If required, organic compound emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

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

b. Emissions Limitation:

VOC emissions from coating and cleanup operations in emissions units R004, R005 and R006, combined, shall not exceed 35.40 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon a summation of VOC emissions from emissions units R004, R005 and R006 determined in accordance with the record keeping specified in d)(7)d. of this permit.

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



- c. Emissions Limitation:
The permittee shall not employ more than ten gallons of coating per day for the miscellaneous metal parts and products coating line.

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

[Authority for term: OAC rules 3745-21-09(U)(2)(e)(iii) and 3745-77-07(A)(3)]

- d. Emissions Limitation:
The VOC content of coatings shall not exceed 6.37 pounds per gallon of coating, as applied, excluding water and exempt solvents.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in d)(8) of this permit.

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

- e. Emissions Limitations:
PE shall not exceed 2.12 pounds per hour and 0.77 ton per year.

Applicable Compliance Method:
Compliance with the emissions limitations was determined based on the following one-time calculations based on a maximum coating use rates of five gallons per hour and 3,650 gallons per year, a maximum solids content of 10.59 pounds per gallon, a transfer efficiency of 60%, a capture efficiency of 100% and a control efficiency of 90%:

$$\begin{aligned}
 \text{PE (lbs/hr)} &= \text{gallons per hour coating use} \times \text{maximum solids content of coating} \times \text{transfer efficiency} \times \text{capture efficiency} \times \text{control efficiency} \\
 &= 5 \text{ gallons/hr} \times 10.59 \text{ pounds solids/gal} \times (1-0.60) \times 100\% \times (1-0.90) \\
 &= 2.12 \text{ pounds per hour}
 \end{aligned}$$

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.

$$\begin{aligned}
 \text{PE (tons/yr)} &= \text{gallons per year coating use} \times \text{maximum solids content of coating} \times \text{transfer efficiency} \times \text{capture efficiency} \times \text{control efficiency} \times 1 \text{ ton}/2,000 \text{ pounds} \\
 &= 3,650 \text{ gallons/yr} \times 10.59 \text{ pounds solids/gal} \times (1-0.60) \times 100\% \times (1-0.90) \times 1 \text{ ton}/2,000 \text{ lbs}
 \end{aligned}$$



= 0.77 tons per year

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

f. Emissions Limitation:

There shall be no visible PE from the stacks serving this emissions unit.

Applicable Compliance Method:

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

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

g. Emissions Limitation:

Organic hazardous air pollutant (HAP) emissions from metal parts coating operations in this emissions unit shall not exceed: 0.31 kg/liter or 2.6 lbs/gallon of coating solids used during each rolling, 12-month period when general use coatings are used, 3.3 kgs/liter or 27.5 lbs/gallon of coating solids used during each rolling, 12-month period when high performance coatings are used and 1.5 kgs/liter or 12.4 lbs/gallon of coating solids used during each rolling, 12-month period when extreme performance fluoropolymer coatings are used.

Applicable Compliance Method:

Compliance with the emissions limitations shall be demonstrated by the recordkeeping specified in d)(9) of this permit and as allowed in 40 CFR 63.3890(c) for operations where more than one of the subcategory emissions limits apply.

[Authority for term: 40 CFR Part 63, Subpart M and OAC rule 3745-77-07(A)(3)]

- (2) Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

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

g) Miscellaneous Requirements

- (1) Modeling for organic toxic air contaminants was not required pursuant to Engineering Guide #70, Question 3 because organic HAP emissions from this emissions unit are subject to 40 CFR Part 63, Subpart M. Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary for inorganic toxic air contaminants because the emissions unit's maximum annual emissions for each inorganic toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit-to-install 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 inorganic toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit-to-install.

[Authority for term: OAC rules 3745-114-01 and 3745-77-07(A)(3)]