State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
MONTGOMERY COUNTY

Street Address:
50 West Town Street, Suite 700
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 08-04778
Fac ID: 0857103289
DATE: 6/12/2008

Three Bond International, Inc.
Kris Singleton
6184 Schumacher Park Drive
West Chester, OH 45069

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **RAPCA**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 6/12/2008**
Terms and Conditions **Effective Date: 6/12/2008**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 08-04778

Application Number:	08-04778
Facility ID:	0857103289
Permit Fee:	**$0**
Name of Facility:	Three Bond International, Inc.
Person to Contact:	Kris Singleton
Address:	6184 Schumacher Park Drive West Chester, OH 45069

Location of proposed air contaminant source(s) [emissions unit(s)]:
101 Daruma Parkway
Moraine, **Ohio**

Description of proposed emissions unit(s):
Administrative modifictation due to 21-07(G)(2) being voided, PTE needs to be re evaluated.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. 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 (i.e., postmarked) 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.)

3. Records Retention Requirements

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.

4. 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.

5. Scheduled Maintenance/Malfunction Reporting

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 appropriate Ohio EPA District Office or local air agency 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).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. 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. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
Volatile organic compound	43.71
single HAP	9.9
combined HAPs	24.9

Modification Issued: 6/12/2008

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K001) - Dip Coater 1, proposed installation date 11/06

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 18.69 lbs/hr excluding cleanup. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C), OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-21-07(G)(2).
OAC rule 3745-21-09(U)(2)(e)(i)	The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.
OAC rule 3745-21-07(G)(2)	On the days when coating nonmetal parts the organic compound (OC) emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day. See section A.2.a below.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V and MACT applicability)	The VOC emissions from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations. See term A.2.c.

2. Additional Terms and Conditions

2.a All the coatings and cleanup materials employed (when coating nonmetal parts) in this emissions unit are photochemically reactive materials. Therefore, no record keeping requirements are necessary to document whether the coatings and/or cleanup materials are photochemically reactive materials.

The OC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive coatings or clean up materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in sections C.1.d, e, f, g and h, D.2.a, and b, E.1.b shall be void.

2.b The pound/hr emission limit was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

2.c The VOC usage rate from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year, based upon a rolling, 12-month summation of the monthly usage rates.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Usage Rate of VOC (Tons)
1	10
1-2	20
1-3	30
1-4	40
1-5	43.71
1-6	43.71
1-7	43.71
1-8	43.71

1-9	43.71
1-10	43.71
1-11	43.71
1-12	43.71

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

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit.

   a. The name and identification of each coating employed (including whether it is used for metal or nonmetal parts) and cleanup material employed.

   b. The volume, in gallons of each coating employed.

   c. On the days when coating metal parts, the total volume, in gallons, of all the coatings employed for the coating of metal parts.

   d. The volume, in gallons of each cleanup material employed.

   e. The OC content of each coating and cleanup material employed, in pounds per gallon.

   f. The total OC emissions rate for all coating and cleanup materials employed, (when coating nonmetal parts) [i.e., summation of (b x e) for all coatings plus (d x e) for all cleanup materials], in pounds.

   g. The total numbers of hours the emissions unit was in operation (when coating nonmetal parts).

   h. The average hourly OC emissions rate for all coatings and cleanup materials, i.e., (f)/(g), in pounds per hour (average) (when coating nonmetal parts).

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, Sections C.1.a, the following phrase: "and cleanup material employed", C.1.d, e, f, g and h, shall be voided]

2. The permittee shall collect and record each month the following information for emissions units (K001 through K008):

   a. The name and identification of each coating and cleanup material employed.

   b. The volume in gallons of each coating and cleanup material employed.

   c. The VOC content of each coating and cleanup material employed, in pounds per gallon.

   d. The total VOC emissions from all cleanup materials employed, [i.e., summation of (b) x (c) for each cleanup material employed], in pounds per month.

   e. The amount of cleanup material recovered, in pounds of VOC.

   f. The total VOC emissions from cleanup operations, in pounds [i.e., (d) - (e)] .

   g. The total VOC emissions from all coating employed, in pounds, [i.e., summation of (b) x (c) for each coating employed].

   h. The total VOC emissions from coating and cleanup materials in tons.

   i. The rolling, 12-month summation of the monthly VOC emissions and usages* in tons.

      *this is based upon the premise that 100% of the VOC usage is emitted as VOC emissions.

3. The permittee shall collect and record each month the following information for the entire facility:

   a. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.

   b. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.

c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from Section A.2.a above).

d. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from Section A.2.b above).

e. The total individual HAP emission rate for all the coatings and cleanup materials employed, in tons.

f. The total combined HAP emission rate for all the coatings and cleanup materials employed, in tons.

g. The rolling, 12- month total individual HAP emission rate for each HAP employed, in tons.

h. The rolling, 12-month total combined HAPs emission rate for all the HAPs employed, in tons.

*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

4. The permit to install for these eight emissions units (K001 through K008) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. Using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for "worst case" pollutant:

Pollutant: Toulene

TLV (mg/m3): 188

Emissions Unit ID: **K001**

Maximum Hourly Emission Rate: 38.24 lbs/hour

Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 3198

MAGLC (ug/m3): 4485

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used (typically for coatings or cleanup materials) or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;

   b. changes in the composition of the materials used, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

   The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the

"Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 8 gallons. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

   a. An identification of each day during which the average hourly OC emissions from the coatings and cleanup materials (when coating nonmetals) exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.

   b. An identification of each day during which the daily OC emissions from the coatings and cleanup materials (when coating nonmetals) exceeded 40 pounds per day, and the actual OC emissions for each such day.

   c. An identification of each month during which the rolling, 12-month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12-month emission rate for each individual HAP for each such month (for the entire facility).

   d. An identification of each month during which the rolling, 12-month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12-month total combined HAP emission rate for each such month (for the entire facility).

These quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, Section D.2.a and b, shall be voided]

3. The permittee shall submit annual reports that specify the actual total VOC emissions, individual, andcombined HAP emissions from the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission data from this facility in the annual Fee Emission Report.

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission and usage limitations for VOC and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative usage levels.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:
   The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.

   Applicable Compliance Method:
   Compliance shall be based upon the record keeping specified in Section C.1.c.

   b. Emissions Limitation:
   On the days when coating nonmetal parts the organic compound (OC) emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day.

   Applicable Compliance Method:
   Compliance shall be based upon the record keeping specified in Section C.1.h. and C.1.f. respectively.

c. Emissions Limitation:
The VOC emissions and usages from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials.

Applicable compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2.i.

d. Emission Limitation-
The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations.

Applicable Compliance Method-
Compliance with the annual allowable individual HAP and combined HAP emission limitation above shall be based upon the record keeping requirements specified in Section C.3.g. and h. respectively.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucus, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, Section E.1.b. shall be voided]

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(C), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.4, C.5

and C.6.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K002) - Dip Coater 2, **proposed installation date 11/06**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 18.69 lbs/hr excluding cleanup. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and, OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-21-07(G)(2).
OAC rule 3745-21-09(U)(2)(e)(i)	The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.
OAC rule 3745-21-07(G)(2)	On the days when coating nonmetal parts the organic compound (OC) emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day. See section A.2.a below.

OAC rule 3745-31-05(C) (synthetic minor to avoid Title V and MACT applicability)	The VOC emissions from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations. See section A.2.c below.

2. Additional Terms and Conditions

2.a All the coatings and cleanup materials employed (when coating nonmetal parts) in this emissions unit are photochemically reactive materials. Therefore, no record keeping requirements are necessary to document whether the coatings and/or cleanup materials are photochemically reactive materials.

The OC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive coatings or clean up materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in sections C.1.d, e, f, g and h, D.2.a, and b, E.1.b shall be void.

2.b The pound/hr emission limit was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

2.c The VOC usage rate from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year, based upon a rolling, 12-month summation of the monthly usage rates.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Usage Rate of VOC (Tons)
1	10
1-2	20
1-3	30
1-4	40
1-5	43.71
1-6	43.71
1-7	43.71

1-8	43.71
1-9	43.71
1-10	43.71
1-11	43.71
1-12	43.71

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

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit.

   a. The name and identification of each coating employed (including whether it is used for metal or nonmetal parts) and cleanup material employed.

   b. The volume, in gallons of each coating employed.

   c. On the days when coating metal parts, the total volume, in gallons, of all the coatings employed for the coating of metal parts.

   d. The volume, in gallons of each cleanup material employed.

   e. The OC content of each coating and cleanup material employed, in pounds per gallon.

   f. The total OC emissions rate for all coating and cleanup materials employed, (when coating nonmetal parts) [i.e., summation of (b x e) for all coatings plus (d x e) for all cleanup materials], in pounds.

   g. The total numbers of hours the emissions unit was in operation (when coating nonmetal parts).

   h. The average hourly OC emissions rate for all coatings and cleanup materials,

i.e., (f)/(g), in pounds per hour (average) (when coating nonmetal parts).

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, Sections C.1.a, the following phrase: "and cleanup material employed", C.1.d, e, f, g and h shall be voided]

2. The permittee shall collect and record each month the following information for emissions units (K001 through K008):

   a. The name and identification of each coating and cleanup material employed.

   b. The volume in gallons of each coating and cleanup material employed.

   c. The VOC content of each coating and cleanup material employed, in pounds per gallon.

   d. The total VOC emissions from all cleanup materials employed, [i.e., summation of (b) x (c) for each cleanup material employed], in pounds per month.

   e. The amount of cleanup material recovered, in pounds.

   f. The total VOC emissions from cleanup operations, in pounds [i.e., (d) - (e)] .

   g. The total VOC emissions from all coating employed, in pounds, [i.e., summation of (b) x (c) for each coating employed].

   h. The total VOC emissions from coating and cleanup materials in tons.

   i. The rolling, 12-month summation of the monthly VOC emissions and usages* in tons.

      *this is based upon the premise that 100% of the VOC usage is emitted as VOC emissions.

3. The permittee shall collect and record each month the following information for the entire facility:

   a. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.

b. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.

c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from Section A.2.a above).

d. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from Section A.2.b above).

e. The total individual HAP emission rate for all the coatings and cleanup materials employed, in tons.

f. The total combined HAP emission rate for all the coatings and cleanup materials employed, in tons.

g. The rolling, 12- month total individual HAP emission rate for each HAP employed, in tons.

h. The rolling, 12-month total combined HAPs emission rate for all the HAPs employed, in tons.

*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

4. The permit to install for these eight emissions units (K001 through K008) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. Using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for "worst case" pollutant:

Pollutant: Toulene

TLV (mg/m3): 188

Maximum Hourly Emission Rate: 38.24 lbs/hour

Predicted 1-Hour Maximum Ground-Level
Concentration at the Fenceline (ug/m3): 3198

MAGLC (ug/m3): 4485

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used (typically for coatings or cleanup materials) or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;

   b. changes in the composition of the materials used, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

   The permittee shall collect, record, and retain the following information when it conducts

evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 8 gallons. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

   a. An identification of each day during which the average hourly OC emissions from the coatings and cleanup materials (when coating nonmetals) exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.

   b. An identification of each day during which the daily OC emissions from the coatings and cleanup materials (when coating nonmetals) exceeded 40 pounds per day, and the actual OC emissions for each such day.

   c. An identification of each month during which the rolling, 12-month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12-month emission rate for each individual HAP for each such month (for the entire facility).

   d. An identification of each month during which the rolling, 12-month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12-month total combined HAP emission rate for each such month (for the entire facility).

These quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, Section D.2.a and b, shall be voided]

3. The permittee shall submit annual reports that specify the actual total VOC emissions, individual, andcombined HAP emissions from the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission data from this facility in the annual Fee Emission Report.

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission and usage limitations for VOC and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative usage levels.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:
   The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.

   Applicable Compliance Method:
   Compliance shall be based upon the record keeping specified in Section C.1.c.

b. Emissions Limitation:
On the days when coating nonmetal parts the Organic compound (OC) emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1.h. and C.1. f. respectively.

c. Emissions Limitation:
The VOC emissions and usages from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials.

Applicable compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2.i.

d. Emission Limitation-
The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations.

Applicable Compliance Method-
Compliance with the annual allowable individual HAP and combined HAP emission limitation above shall be based upon the record keeping requirements specified in Section C.3.g. and h. respectively.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucus, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of

the cleanup materials.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, Section E.1.b. shall be voided]

Modification Issued: 6/12/2008

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(C), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.4, C.5 and C.6.

Modification Issued: 6/12/2008

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K003) - Dip Coater 3, proposed installation date 11/06

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 18.69 lbs/hr excluding cleanup. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C), OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-21-07(G)(2).
OAC rule 3745-21-09(U)(2)(e)(i)	The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.
OAC rule 3745-21-07(G)(2)	On the days when coating nonmetal parts the organic compound (OC) emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day. See section A.2.a below.

OAC rule 3745-31-05(C) (synthetic minor to avoid Title V and MACT applicability)	The VOC emissions from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations. See section A.2.c below.

2. Additional Terms and Conditions

2.a All the coatings and cleanup materials employed (when coating nonmetal parts) in this emissions unit are photochemically reactive materials. Therefore, no record keeping requirements are necessary to document whether the coatings and/or cleanup materials are photochemically reactive materials.

The OC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive coatings or clean up materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in sections C.1.d, e, f, g and h, D.2.a, and b, E.1.b shall be void.

2.b The pound/hr emission limit was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

2.c The VOC usage rate from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year, based upon a rolling, 12-month summation of the monthly usage rates.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Usage Rates of VOC (Tons)
1	10
1-2	20
1-3	30
1-4	40
1-5	43.71
1-6	43.71
1-7	43.71

1-8	43.71
1-9	43.71
1-10	43.71
1-11	43.71
1-12	43.71

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

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit.

   a. The name and identification of each coating employed (including whether it is used for metal or nonmetal parts) and cleanup material employed.

   b. The volume, in gallons of each coating employed.

   c. On the days when coating metal parts, the total volume, in gallons, of all the coatings employed for the coating of metal parts.

   d. The volume, in gallons of each cleanup material employed.

   e. The OC content of each coating and cleanup material employed, in pounds per gallon.

   f. The total OC emissions rate for all coating and cleanup materials employed, (when coating nonmetal parts) [i.e., summation of (b x e) for all coatings plus (d x e) for all cleanup materials], in pounds.

   g. The total numbers of hours the emissions unit was in operation (when coating nonmetal parts).

   h. The average hourly OC emissions rate for all coatings and cleanup materials,

i.e., (f)/(g), in pounds per hour (average) (when coating nonmetal parts).

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, Sections C.1.a, the following phrase: "and cleanup material employed", C.1.d, e, f, g and h shall be voided]

2. The permittee shall collect and record each month the following information for emissions units (K001 through K008):

   a. The name and identification of each coating and cleanup material employed.

   b. The volume in gallons of each coating and cleanup material employed.

   c. The VOC content of each coating and cleanup material employed, in pounds per gallon.

   d. The total VOC emissions from all cleanup materials employed, [i.e., summation of (b) x (c) for each cleanup material employed], in pounds per month.

   e. The amount of cleanup material recovered, in pounds.

   f. The total VOC emissions from cleanup operations, in pounds [i.e., (d) - (e)] .

   g. The total VOC emissions from all coating employed, in pounds, [i.e., summation of (b) x (c) for each coating employed].

   h. The total VOC emissions from coating and cleanup materials in tons.

   i. The rolling, 12-month summation of the monthly VOC emissions and usage* rates, in tons.

      *this is based upon the premise that 100% of the VOC usage is emitted as VOC emissions.

3. The permittee shall collect and record each month the following information for the entire facility:

   a. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.

b. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.

c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from Section A.2.a above).

d. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from Section A.2.b above).

e. The total individual HAP emission rate for all the coatings and cleanup materials employed, in tons.

f. The total combined HAP emission rate for all the coatings and cleanup materials employed, in tons.

g. The rolling, 12- month total individual HAP emission rate for each HAP employed, in tons.

h. The rolling, 12-month total combined HAPs emission rate for all the HAPs employed, in tons.

*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

4. The permit to install for these eight emissions units (K001 through K008) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. Using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for "worst case" pollutant:

Pollutant: Toulene

TLV (mg/m3): 188

Maximum Hourly Emission Rate: 38.24 lbs/hour

Predicted 1-Hour Maximum Ground-Level
Concentration at the Fenceline (ug/m3): 3198

MAGLC (ug/m3): 4485

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used (typically for coatings or cleanup materials) or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the

most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;

b. changes in the composition of the materials used, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

   The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 8 gallons. The notification shall

include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

   a. An identification of each day during which the average hourly OC emissions from the coatings and cleanup materials (when coating nonmetals) exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.

   b. An identification of each day during which the daily OC emissions from the coatings and cleanup materials (when coating nonmetals) exceeded 40 pounds per day, and the actual OC emissions for each such day.

   c. An identification of each month during which the rolling, 12-month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12-month emission rate for each individual HAP for each such month (for the entire facility).

   d. An identification of each month during which the rolling, 12-month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12-month total combined HAP emission rate for each such month (for the entire facility).

   These quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

   [Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, Section D.2.a and b, shall be voided]

3. The permittee shall submit annual reports that specify the actual total VOC emissions, individual, andcombined HAP emissions from the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission data from this facility in the annual Fee Emission Report.

4. The permittee shall submit quarterly deviation (excursion) reports which identify all

exceedances of the rolling, 12-month emission and usage rate limitations for VOC and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative usage rate levels.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:
   The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.

   Applicable Compliance Method:
   Compliance shall be based upon the record keeping specified in Section C.1.c.

   b. Emissions Limitation:
   On the days when coating nonmetal parts the Organic compound (OC) emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day.

   Applicable Compliance Method:
   Compliance shall be based upon the record keeping specified in Section C.1.h. and C.1. f. respectively.

   c. Emissions Limitation:
   The VOC emissions from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials.

   Applicable compliance Method:
   Compliance shall be based upon the record keeping specified in Section C.2.i.

   d. Emission Limitation-
   The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations.

   Applicable Compliance Method-
   Compliance with the annual allowable individual HAP and combined HAP

emission limitation above shall be based upon the record keeping requirements specified in Section C.3.g. and h. respectively.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucus, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

   US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

   [Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, Section E.1.b. shall be voided]

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(C), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.4, C.5 and C.6.

Emissions Unit ID: **K004**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K004) - Dip Coater 4, proposed installation date 11/06

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 18.69 lbs/hr excluding cleanup. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and, OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-21-07(G)(2).
OAC rule 3745-21-09(U)(2)(e)(i)	The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.
OAC rule 3745-21-07(G)(2)	On the days when coating nonmetal parts the organic compound (OC) emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day. See section A.2.a below.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V and MACT applicability)	The VOC emissions from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations. See section A.2.c below.

Emissions Unit ID: **K004**

Modification Issued: 6/12/2008

2. Additional Terms and Conditions

2.a All the coatings and cleanup materials employed (when coating nonmetal parts) in this emissions unit are photochemically reactive materials. Therefore, no record keeping requirements are necessary to document whether the coatings and/or cleanup materials are photochemically reactive materials.

The OC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive coatings or clean up materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in sections C.1.d, e, f, g and h, D.2.a, and b, E.1.b shall be void.

2.b The pound/hr emission limit was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

2.c The VOC usage rate from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year, based upon a rolling, 12-month summation of the monthly usage rates.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rate levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Usage Rates of VOC (Tons)
1	10
1-2	20
1-3	30
1-4	40
1-5	43.71
1-6	43.71
1-7	43.71

1-8	43.71
1-9	43.71
1-10	43.71
1-11	43.71
1-12	43.71

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

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit.

   a. The name and identification of each coating employed (including whether it is used for metal or nonmetal parts) and cleanup material employed.

   b. The volume, in gallons of each coating employed.

   c. On the days when coating metal parts, the total volume, in gallons, of all the coatings employed for the coating of metal parts.

   d. The volume, in gallons of each cleanup material employed.

   e. The OC content of each coating and cleanup material employed, in pounds per gallon.

   f. The total OC emissions rate for all coating and cleanup materials employed, (when coating nonmetal parts) [i.e., summation of (b x e) for all coatings plus (d x e) for all cleanup materials], in pounds.

   g. The total numbers of hours the emissions unit was in operation (when coating nonmetal parts).

   h. The average hourly OC emissions rate for all coatings and cleanup materials,

i.e., (f)/(g), in pounds per hour (average) (when coating nonmetal parts).

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, Sections C.1.a, the following phrase: "and cleanup material employed", C.1.d, e, f, g and h shall be voided]

2. The permittee shall collect and record each month the following information for emissions units (K001 through K008):

   a. The name and identification of each coating and cleanup material employed.

   b. The volume in gallons of each coating and cleanup material employed.

   c. The VOC content of each coating and cleanup material employed, in pounds per gallon.

   d. The total VOC emissions from all cleanup materials employed, [i.e., summation of (b) x (c) for each cleanup material employed], in pounds per month.

   e. The amount of cleanup material recovered, in pounds.

   f. The total VOC emissions from cleanup operations, in pounds [i.e., (d) - (e)] .

   g. The total VOC emissions from all coating employed, in pounds, [i.e., summation of (b) x (c) for each coating employed].

   h. The total VOC emissions from coating and cleanup materials in tons.

   i. The rolling, 12-month summation of the monthly VOC emissions and usage* rates, in tons.

      *this is based upon the premise that 100% of the VOC usage is emitted as VOC emissions.

3. The permittee shall collect and record each month the following information for the entire facility:

   a. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.

b. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.

c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from Section A.2.a above).

d. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from Section A.2.b above).

e. The total individual HAP emission rate for all the coatings and cleanup materials employed, in tons.

f. The total combined HAP emission rate for all the coatings and cleanup materials employed, in tons.

g. The rolling, 12- month total individual HAP emission rate for each HAP employed, in tons.

h. The rolling, 12-month total combined HAPs emission rate for all the HAPs employed, in tons.

*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

4. The permit to install for these eight emissions units (K001 through K008) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. Using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for "worst case" pollutant:

Pollutant: Toulene

TLV (mg/m3): 188

Maximum Hourly Emission Rate: 38.24 lbs/hour

Predicted 1-Hour Maximum Ground-Level
Concentration at the Fenceline (ug/m3): 3198

MAGLC (ug/m3): 4485

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used (typically for coatings or cleanup materials) or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the

most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;

b. changes in the composition of the materials used, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

   The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 8 gallons. The notification shall

include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

   a. An identification of each day during which the average hourly OC emissions from the coatings and cleanup materials (when coating nonmetals) exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.

   b. An identification of each day during which the daily OC emissions from the coatings and cleanup materials (when coating nonmetals) exceeded 40 pounds per day, and the actual OC emissions for each such day.

   c. An identification of each month during which the rolling, 12-month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12-month emission rate for each individual HAP for each such month (for the entire facility).

   d. An identification of each month during which the rolling, 12-month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12-month total combined HAP emission rate for each such month (for the entire facility).

   These quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

   [Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, Section D.2.a and b, shall be voided]

3. The permittee shall submit annual reports that specify the actual total VOC emissions, individual, andcombined HAP emissions from the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission data from this facility in the annual Fee Emission Report.

4. The permittee shall submit quarterly deviation (excursion) reports which identify all

exceedances of the rolling, 12-month emission and usage rate limitations for VOC and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative usage rate levels.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:
   The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.

   Applicable Compliance Method:
   Compliance shall be based upon the record keeping specified in Section C.1.c.

   b. Emissions Limitation:
   On the days when coating nonmetal parts the Organic compound (OC) emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day.

   Applicable Compliance Method:
   Compliance shall be based upon the record keeping specified in Section C.1.h. and C.1. f. respectively.

   c. Emissions Limitation:
   The VOC emissions and usages from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials.

   Applicable compliance Method:
   Compliance shall be based upon the record keeping specified in Section C.2.i.

   d. Emission Limitation-
   The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations.

   Applicable Compliance Method-
   Compliance with the annual allowable individual HAP and combined HAP

emission limitation above shall be based upon the record keeping requirements specified in Section C.3.g. and h. respectively.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucus, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

   US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

   [Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, Section E.1.b. shall be voided]

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(C), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.4, C.5 and C.6.

Emissions Unit ID: **K005**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K005) - Dip Coater 5, **proposed installation date 11/06**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 18.69 lbs/hr excluding cleanup. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and, OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-21-07(G)(2).
OAC rule 3745-21-09(U)(2)(e)(i)	The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.
OAC rule 3745-21-07(G)(2)	On the days when coating nonmetal parts the organic compound (OC) emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day. See section A.2.a below.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V and MACT applicability)	The VOC emissions from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations. See section A.2.c below.

Emissions Unit ID: **K005**

Modification Issued: 6/12/2008

2. Additional Terms and Conditions

2.a All the coatings and cleanup materials employed (when coating nonmetal parts) in this emissions unit are photochemically reactive materials. Therefore, no record keeping requirements are necessary to document whether the coatings and/or cleanup materials are photochemically reactive materials.

The OC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive coatings or clean up materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in sections C.1.d, e, f, g and h, D.2.a, and b, E.1.b shall be void.

2.b The pound/hr emission limit was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

2.c The VOC usage rate from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year, based upon a rolling, 12-month summation of the monthly usage rates.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rate levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Usage Rates of VOC (Tons)
1	10
1-2	20
1-3	30
1-4	40
1-5	43.71
1-6	43.71
1-7	43.71

1-8	43.71
1-9	43.71
1-10	43.71
1-11	43.71
1-12	43.71

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

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit.

   a. The name and identification of each coating employed (including whether it is used for metal or nonmetal parts) and cleanup material employed.

   b. The volume, in gallons of each coating employed.

   c. On the days when coating metal parts, the total volume, in gallons, of all the coatings employed for the coating of metal parts.

   d. The volume, in gallons of each cleanup material employed.

   e. The OC content of each coating and cleanup material employed, in pounds per gallon.

   f. The total OC emissions rate for all coating and cleanup materials employed, (when coating nonmetal parts) [i.e., summation of (b x e) for all coatings plus (d x e) for all cleanup materials], in pounds.

   g. The total numbers of hours the emissions unit was in operation (when coating nonmetal parts).

   h. The average hourly OC emissions rate for all coatings and cleanup materials,

i.e., (f)/(g), in pounds per hour (average) (when coating nonmetal parts).

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, Sections C.1.a, the following phrase: "and cleanup material employed", C.1.d, e, f, g and h shall be voided]

2. The permittee shall collect and record each month the following information for emissions units (K001 through K008):

   a. The name and identification of each coating and cleanup material employed.

   b. The volume in gallons of each coating and cleanup material employed.

   c. The VOC content of each coating and cleanup material employed, in pounds per gallon.

   d. The total VOC emissions from all cleanup materials employed, [i.e., summation of (b) x (c) for each cleanup material employed], in pounds per month.

   e. The amount of cleanup material recovered, in pounds.

   f. The total VOC emissions from cleanup operations, in pounds [i.e., (d) - (e)] .

   g. The total VOC emissions from all coating employed, in pounds, [i.e., summation of (b) x (c) for each coating employed].

   h. The total VOC emissions from coating and cleanup materials in tons.

   i. The rolling, 12-month summation of the monthly VOC emissions and usage* rates, in tons.

      *this is based upon the premise that 100% of the VOC usage is emitted as VOC emissions.

3. The permittee shall collect and record each month the following information for the entire facility:

   a. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.

b. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.

c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from Section A.2.a above).

d. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from Section A.2.b above).

e. The total individual HAP emission rate for all the coatings and cleanup materials employed, in tons.

f. The total combined HAP emission rate for all the coatings and cleanup materials employed, in tons.

g. The rolling, 12- month total individual HAP emission rate for each HAP employed, in tons.

h. The rolling, 12-month total combined HAPs emission rate for all the HAPs employed, in tons.

*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

4. The permit to install for these eight emissions units (K001 through K008) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. Using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for "worst case" pollutant:

Pollutant: Toulene

TLV (mg/m3): 188

Maximum Hourly Emission Rate: 38.24 lbs/hour

Predicted 1-Hour Maximum Ground-Level

Concentration at the Fenceline (ug/m3): 3198

MAGLC (ug/m3): 4485

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used (typically for coatings or cleanup materials) or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;

   b. changes in the composition of the materials used, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 8 gallons. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. An identification of each day during which the average hourly OC emissions from the coatings and cleanup materials (when coating nonmetals) exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.

b. An identification of each day during which the daily OC emissions from the coatings and cleanup materials (when coating nonmetals) exceeded 40 pounds per day, and the actual OC emissions for each such day.

c. An identification of each month during which the rolling, 12-month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12-month emission rate for each individual HAP for each such month (for the entire facility).

d. An identification of each month during which the rolling, 12-month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12-month total combined HAP emission rate for each such month (for the entire facility).

These quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, Section D.2.a and b, shall be voided]

3. The permittee shall submit annual reports that specify the actual total VOC emissions, individual, andcombined HAP emissions from the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission data from this facility in the annual Fee Emission Report.

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month usage rate limitation for VOC and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative usage rate levels.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1.c.

b. Emissions Limitation:
On the days when coating nonmetal parts the Organic compound (OC) emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1.h. and C.1. f. respectively.

c. Emissions Limitation:
The VOC emissions and usages from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials.

Applicable compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2.i.

d. Emission Limitation-
The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations.

Applicable Compliance Method-
Compliance with the annual allowable individual HAP and combined HAP emission limitation above shall be based upon the record keeping requirements specified in Section 3.g. and h. respectively.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucus, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit,

Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, Section E.1.b. shall be voided]

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(C), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.4, C.5 and C.6.

Emissions Unit ID: **K006**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K006) - Automated Coater 1, proposed installation date 11/06

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 9.23 lbs/hr excluding cleanup. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-21-09(U)(2)(e)(i).
OAC rule 3745-21-09(U)(2)(e)(i)	The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V and MACT applicability)	The VOC emissions from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations. See term A.2.b.

2. Additional Terms and Conditions

2.a The pound/hr emission limit was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop

record keeping and/or reporting requirements to ensure compliance with this limitation.

2.b The VOC usage rate from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year, based upon a rolling, 12-month summation of the monthly usage rates.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rate levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Usage Rates of VOC (Tons)
1	10
1-2	20
1-3	30
1-4	40
1-5	43.71
1-6	43.71
1-7	43.71
1-8	43.71
1-9	43.71
1-10	43.71
1-11	43.71
1-12	43.71

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

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for the

coating line:

a. The name and identification number of each coating employed.

b. The volume, in gallons, of each coating employed.

c. The total volume, in gallons, of all of the coatings employed.

2. The permittee shall collect and record each month the following information for emissions units (K001 through K008):

   a. The name and identification of each coating and cleanup material employed.

   b. The volume in gallons of each coating and cleanup material employed.

   c. The VOC content of each coating and cleanup material employed, in pounds per gallon.

   d. The total VOC emissions from all cleanup materials employed, [i.e., summation of (b) x (c) for each cleanup material employed], in pounds per month.

   e. The amount of cleanup material recovered, in pounds.

   f. The total VOC emissions from cleanup operations, in pounds [i.e., (d) - (e)] .

   g. The total VOC emissions from all coating employed, in pounds, [i.e., summation of (b) x (c) for each coating employed].

   h. The total VOC emissions from coating and cleanup materials in tons.

   i. The rolling, 12-month summation of the monthly VOC emissions and usage* rates, in tons.

      *this is based upon the premise that 100% of the VOC usage is emitted as VOC emissions.

3. The permittee shall collect and record each month the following information for the entire facility:

   a. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.

   b. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.

   c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from Section A.3.a above).

d. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from Section A.3.b above).

e. The total individual HAP emission rate for all the coatings and cleanup materials employed, in tons.

f. The total combined HAP emission rate for all the coatings and cleanup materials employed, in tons.

g. The rolling, 12- month total individual HAP emission rate for each HAP employed, in tons.

h. The rolling, 12-month total combined HAPs emission rate for all the HAPs employed, in tons.

*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

4. The permit to install for these eight emissions units (K001 through K008) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. Using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for "worst case" pollutant:

   Pollutant: Toulene

   TLV (mg/m3): 188

   Maximum Hourly Emission Rate: 38.24 lbs/hour

   Predicted 1-Hour Maximum Ground-Level
   Concentration at the Fenceline (ug/m3): 3198

   MAGLC (ug/m3): 4485

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or

not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials) or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;

b. changes in the composition of the materials used, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 8 gallons. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

   a. An identification of each month during which the rolling, 12-month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12-month emission rate for each individual HAP for each such month (for the entire facility).

   b. An identification of each month during which the rolling, 12-month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12-month total combined HAP emission rate for each such month (for the entire facility).

   These quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

3. The permittee shall submit annual reports that specify the actual total VOC emissions, individual, andcombined HAP emissions from the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission data from this facility in the annual Fee Emission Report.

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission and usage rate limitations for VOC and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative usage levels.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:
   The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.

   Applicable Compliance Method:
   Compliance shall be based upon the record keeping specified in Section C.1.c.

   b. Emissions Limitation:
   The VOC emissions and usages from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials.

   Applicable compliance Method:
   Compliance shall be based upon the record keeping specified in Section C.2.i.

   c. Emission Limitation:
   The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations.

   Applicable Compliance Method-
   Compliance with the annual allowable individual HAP and combined HAP emission limitation above shall be based upon the record keeping requirements specified in Section C.3.g. and h. respectively.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(C), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.4, C.5 and C.6.

Emissions Unit ID: **K006**

Emissions Unit ID: **K007**

Modification Issued: 6/12/2008

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K007) - Rotary Coater 1, proposed installation date 11/06

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 9.23 lbs/hr excluding cleanup. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and, OAC rule 3745-21-09(U)(2)(e)(i)
OAC rule 3745-21-09(U)(2)(e)(i)	The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V and MACT applicability)	The VOC emissions from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations. See term A.2.b.

2. Additional Terms and Conditions

2.a The pound/hr emission limit was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

2.b The VOC usage rate from this emissions unit shall not exceed 43.71 tons per year, based upon a rolling, 12-month summation of the monthly usage rates.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rate levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Usage Rates of VOC (Tons)
1	10
1-2	20
1-3	30
1-4	40
1-5	43.71
1-6	43.71
1-7	43.71
1-8	43.71
1-9	43.71
1-10	43.71
1-11	43.71
1-12	43.71

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

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

Emissions Unit ID: **K007**

1. The permittee shall collect and record the following information each day for the coating line:

   a. The name and identification number of each coating employed.

   b. The volume, in gallons, of each coating employed.

   c. The total volume, in gallons, of all of the coatings employed.

2. The permittee shall collect and record each month the following information for emissions units (K001 through K008):

   a. The name and identification of each coating and cleanup material employed.

   b. The volume in gallons of each coating and cleanup material employed.

   c. The VOC content of each coating and cleanup material employed, in pounds per gallon.

   d. The total VOC emissions from all cleanup materials employed, [i.e., summation of (b) x (c) for each cleanup material employed], in pounds per month.

   e. The amount of cleanup material recovered, in pounds.

   f. The total VOC emissions from cleanup operations, in pounds [i.e., (d) - (e)] .

   g. The total VOC emissions from all coating employed, in pounds, [i.e., summation of (b) x (c) for each coating employed].

   h. The total VOC emissions from coating and cleanup materials in tons.

   i. The rolling, 12-month summation of the monthly VOC emissions and usage* rates, in tons.

      *this is based upon the premise that 100% of the VOC usage is emitted as VOC emissions.

3. The permittee shall collect and record each month the following information for the entire facility:

   a. The individual Hazardous Air Pollutant (HAP) content for each HAP of each

coating material, in pounds of individual HAP per gallon, as applied.

b. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.

c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from Section A.3.a above).

d. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from Section A.3.b above).

e. The total individual HAP emission rate for all the coatings and cleanup materials employed, in tons.

f. The total combined HAP emission rate for all the coatings and cleanup materials employed, in tons.

g. The rolling, 12- month total individual HAP emission rate for each HAP employed, in tons.

h. The rolling, 12-month total combined HAPs emission rate for all the HAPs employed, in tons.

*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

4. The permit to install for these eight emissions units (K001 through K008) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. Using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for "worst case" pollutant:

   Pollutant: Toulene

   TLV (mg/m3): 188

   Maximum Hourly Emission Rate: 38.24 lbs/hour

   Predicted 1-Hour Maximum Ground-Level
   Concentration at the Fenceline (ug/m3): 3198

   MAGLC (ug/m3): 4485

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee

determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials) or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;

b. changes in the composition of the materials used, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

   The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the

change.

D. Reporting Requirements

1. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 8 gallons. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

   a. An identification of each month during which the rolling, 12-month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12-month emission rate for each individual HAP for each such month (for the entire facility).

   b. An identification of each month during which the rolling, 12-month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12-month total combined HAP emission rate for each such month (for the entire facility).

   These quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

3. The permittee shall submit annual reports that specify the actual total VOC emissions, individual, andcombined HAP emissions from the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission data from this facility in the annual Fee Emission Report.

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission and usage rate limitations for VOC and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative usage rate levels.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:
   The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.

   Applicable Compliance Method:
   Compliance shall be based upon the record keeping specified in Section C.1.c.

   b. Emissions Limitation:
   The VOC emissions and usage rates from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials.

   Applicable compliance Method:
   Compliance shall be based upon the record keeping specified in Section C.2.i.

   c. Emission Limitation-
   The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations.

   Applicable Compliance Method-
   Compliance with the annual allowable individual HAP and combined HAP emission limitation above shall be based upon the record keeping requirements specified in Section C.3.g. and h. respectively.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(C), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.4, C.5 and C.6.

Modification Issued: 6/12/2008

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K008) - Tumbling Process 1, proposed installation date 11/06

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 18.69 lbs/hr excluding cleanup. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and, OAC rule 3745-21-09(U)(2)(e)(i)
OAC rule 3745-21-09(U)(2)(e)(i)	The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V and MACT applicability)	The VOC emissions from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations. See term A.2.b.

2. Additional Terms and Conditions

2.a The pound/hr emission limit was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

2.b The VOC usage rate from this emissions unit shall not exceed 43.71 tons per year, based upon a rolling, 12-month summation of the monthly usage rates.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rate levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Usage Rates of VOC (Tons)
1	10
1-2	20
1-3	30
1-4	40
1-5	43.71
1-6	43.71
1-7	43.71
1-8	43.71
1-9	43.71
1-10	43.71
1-11	43.71
1-12	43.71

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

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

Emissions Unit ID: **K008**

1. The permittee shall collect and record the following information each day for the coating line:

   a. The name and identification number of each coating employed.

   b. The volume, in gallons, of each coating employed.

   c. The total volume, in gallons, of all of the coatings employed.

2. The permittee shall collect and record each month the following information for emissions units (K001 through K008):

   a. The name and identification of each coating and cleanup material employed.

   b. The volume in gallons of each coating and cleanup material employed.

   c. The VOC content of each coating and cleanup material employed, in pounds per gallon.

   d. The total VOC emissions from all cleanup materials employed, [i.e., summation of (b) x (c) for each cleanup material employed], in pounds per month.

   e. The amount of cleanup material recovered, in pounds.

   f. The total VOC emissions from cleanup operations, in pounds [i.e., (d) - (e)] .

   g. The total VOC emissions from all coating employed, in pounds, [i.e., summation of (b) x (c) for each coating employed].

   h. The total VOC emissions from coating and cleanup materials in tons.

   i. The rolling, 12-month summation of the monthly VOC emissions and usage* rates, in tons.

      *this is based upon the premise that 100% of the VOC usage is emitted as VOC emissions.

3. The permittee shall collect and record each month the following information for the entire facility:

   a. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.

b. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.

c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from Section A.3.a above).

d. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from Section A.3.b above).

e. The total individual HAP emission rate for all the coatings and cleanup materials employed, in tons.

f. The total combined HAP emission rate for all the coatings and cleanup materials employed, in tons.

g. The rolling, 12- month total individual HAP emission rate for each HAP employed, in tons.

h. The rolling, 12-month total combined HAPs emission rate for all the HAPs employed, in tons.

*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

4. The permit to install for these eight emissions units (K001 through K008) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. Using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for "worst case" pollutant:

   Pollutant: Toulene

   TLV (mg/m3): 188

   Maximum Hourly Emission Rate: 38.24 lbs/hour

   Predicted 1-Hour Maximum Ground-Level
   Concentration at the Fenceline (ug/m3): 3198

   MAGLC (ug/m3): 4485

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee

determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials) or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;

b. changes in the composition of the materials used, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

   The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 8 gallons. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

   a. An identification of each month during which the rolling, 12-month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12-month emission rate for each individual HAP for each such month (for the entire facility).

   b. An identification of each month during which the rolling, 12-month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12-month total combined HAP emission rate for each such month (for the entire facility).

   These quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

3. The permittee shall submit annual reports that specify the actual total VOC emissions, individual, andcombined HAP emissions from the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission data from this facility in the annual Fee Emission Report.

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission and usage rate limitations for VOC and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative usage rate levels.

E. Testing Requirements

Emissions Unit ID: **K008**

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:
   The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.

   Applicable Compliance Method:
   Compliance shall be based upon the record keeping specified in Section C.1.c.

   b. Emissions Limitation:
   The VOC emissions and usage rates from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials.

   Applicable compliance Method:
   Compliance shall be based upon the record keeping specified in Section C.2.i.

   c. Emission Limitation-
   The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations.

   Applicable Compliance Method-
   Compliance with the annual allowable individual HAP and combined HAP emission limitation above shall be based upon the record keeping requirements specified in Section C.3.g. and h. respectively.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(C), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.4, C.5 and C.6.

Emissions Unit ID: **K008**

Modification Issued: 6/12/2008