



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

08/27/99

**CERTIFIED MAIL**

01-25-04-1404

WORTHINGTON CYLINDER CORPORATION  
STEVEN T. GENTRY  
1085 DEARBORN DRIVE  
COLUMBUS, OH 43085-0391

**RE: Final Chapter 3745-35 Permit To Operate**

Dear STEVEN T. GENTRY:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street  
Room 300  
Columbus, Ohio 43215

If you have any questions, please contact the Central District Office at (614) 728-3778

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: Central District Office

Jim Orlemann, DAPC Engineering  
Becky Castle, DAPC PMU

**PERMIT TO OPERATE AN EMISSIONS UNIT**

Effective Date: 08/27/99

Facility ID: 01-25-04-1404

Expiration Date: 08/27/04

**FINAL ISSUE**

This document constitutes issuance for:

**WORTHINGTON CYLINDER CORPORATION  
1085 DEARBORN DRIVE  
COLUMBUS, OH 43085-0391**

of a permit to operate for:

**K001 (REFRIGERANT PAI)  
REFRIGERANT PAI**

**1. Compliance Requirements**

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

**2. Permit to Install Requirement**

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

**3. Reporting Requirements Related to Monitoring and Recordkeeping 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 quarterly, i.e., 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.)

**4. 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 the permit. Such records may be maintained in computerized form.

**5. 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 and federal 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.

**6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

**7. Permit Transfers**

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

**8. 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.

**9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

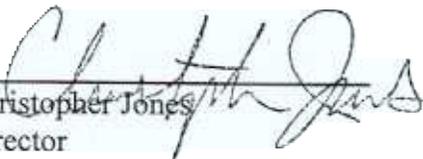
10. The permittee is also subject to the attached special terms and conditions.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Central District Office  
3232 Alum Creek Drive  
PO Box 1049  
Columbus, OH 43216-1049  
(614) 728-3778

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Central District Office.

**OHIO ENVIRONMENTAL PROTECTION AGENCY**

  
Christopher Jones  
Director

**Part II: Special Terms and Conditions**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Pressure cylinder paint line (Dot 39) with 1.5 MMBtu/hr gas-fired burner used to heat booth make-up air.	OAC Rule 3745-21-09(U)(1)(c)	The emission limitation in this rule is less stringent than PTI No. 01-764.
	OAC Rule 3745-35-07	The volatile organic compound (VOC) emissions from K001 shall not exceed 41.3 tons per year from coating and cleanup material usage based upon a rolling, 12-month summation of the emissions.
	OAC Rule 3745-31-05 PTI No. 01-764	The annual, individual and combined hazardous air pollutant emissions from all emissions units at this facility shall not exceed 9.9 tons per year and 24.9 tons per year, respectively.
	OAC Rule 3745-17-11(B)(1)	3.2 lbs VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average.
	OAC Rule 3745-17-07(A)(1)	6.71 lbs VOC per gallon of cleanup material, excluding water and exempt solvents.
		Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

- 2.a The facility-wide individual and combined hazardous air pollutant (HAP) emissions are effectively limited to less than 10 tons and 25 tons per year, respectively, by limiting the total VOC emissions from K001, K002 and K003.

**B. Operational Restrictions**

- The maximum annual coating usage for K001 shall not exceed 25,000 gallons, based upon a rolling, 12-month summation of the coating usage figures.
- The maximum annual cleanup material usage for K001 shall not exceed 372 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.
- The permittee shall operate the dry filtration system whenever K001 is in operation.

### C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
  - a. The coating usage for each month.
  - b. The cleanup material usage for each month.
  - c. The rolling, 12-month summation of the coating usage figures.
  - d. The rolling, 12-month summation of the cleanup material usage figures.
  - e. The individual HAP and total combined HAP content of each coating and cleanup material employed.
2. The permittee shall collect and record the following information each day for the line:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.
3. The permittee shall collect and record each month the following information for the purpose of determining annual VOC emissions:
  - a. The name and identification of each cleanup material employed.
  - b. The number of gallons of each cleanup material employed.
  - c. The VOC content of each cleanup material, in pounds per gallon and in pounds per gallon excluding water and exempt solvents.
  - d. The total VOC emissions from all coatings and cleanup materials, in tons .
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when K001 was in operation.
5. The volume-weighted average VOC content of all coatings, as applied, shall be calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2 on days when any paint with a VOC content in excess of the applicable limit is applied.

### D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month usage limitations for coatings and cleanup materials. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section A.1.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the VOC content of any coating exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
3. The permittee shall submit annual reports which specify the total VOC emissions, total emissions of each individual HAP, total coating usage, and total cleanup material usage for K001 for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the VOC content of any cleanup material exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
5. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when K001 was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

### E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

**E. Testing Requirements (continued)**

- 1.a** Emission limitation:  
The yearly VOC emissions for K001 shall not exceed 41.24 tons per year

Applicable Compliance Method:  
Compliance with the 41.24 tons per year shall be based upon the record keeping requirements specified in Section C.

- 1.b** Emission Limitation:  
3.2 pounds VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average.

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used 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.

- 1.c** Emission Limitation:  
6.71 pounds VOC per gallon of cleanup material, excluding water and exempt solvents.

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section C. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound contents of the cleanup materials.

- 1.d** Emission limitation:  
The particulate matter emissions shall not exceed 0.551 lb per hour.

Applicable Compliance Method:  
To determine the emissions rate for particulate matter, the following equation shall be used:

$$E = \text{maximum coating solids usage rate (pounds/hr)} \times (1-TE) \times (1-CE)$$

Where:

E = particulate matter emissions rate (lbs/hr)  
TE = transfer efficiency of painting equipment in decimal form (use 0.50), transfer efficiency is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used  
CE = control efficiency of the control equipment in decimal form (99% for filters)

- 1.e** Emission Limitation:  
Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method:  
If required, the permittee shall demonstrate compliance with this emission limitation by the method specified in OAC rule 3745-17-03(B)(1)

**F. Miscellaneous Requirements**

1. Pursuant to OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable:  
A - F.



**PERMIT TO OPERATE AN EMISSIONS UNIT**

Effective Date: 08/27/99

Facility ID: 01-25-04-1404

Expiration Date: 08/27/04

**FINAL ISSUE**

This document constitutes issuance for:

**WORTHINGTON CYLINDER CORPORATION  
1085 DEARBORN DRIVE  
COLUMBUS, OH 43085-0391**

of a permit to operate for:

**K003 (SILK SCREENING)  
SILK SCREENING**

**1. Compliance Requirements**

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

**2. Permit to Install Requirement**

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

**3. Reporting Requirements Related to Monitoring and Recordkeeping 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 quarterly, i.e., 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.)

#### **4. 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 the permit. Such records may be maintained in computerized form.

#### **5. 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 and federal 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.

#### **6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

#### **7. Permit Transfers**

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

#### **8. 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.

#### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

**10. The permittee is also subject to the attached special terms and conditions.**

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Central District Office  
3232 Alum Creek Drive  
PO Box 1049  
Columbus, OH 43216-1049  
(614) 728-3778

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Central District Office.

**OHIO ENVIRONMENTAL PROTECTION AGENCY**

A handwritten signature in cursive script, appearing to read "Christopher Jones", written over a horizontal line.

Christopher Jones  
Director

**Part II: Special Terms and Conditions**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Two station silk screening operation	OAC Rule 3745-21-09(U)(1)  OAC Rule 3745-35-07	Exemption from emission limitation in OAC Rule 3745-21-09(U)(1) per OAC Rule 3745-21-09(U)(2)(e)(ii)  The volatile organic compound (VOC) emissions from K003 shall not exceed 4.93 tons per year from coating and cleanup material usage based upon a rolling, 12-month summation of the emissions.  6.0 lbs VOC per gallon of coating excluding water and exempt solvents.  7.5 lbs VOC per gallon of cleanup material excluding water and exempt solvents.  The annual, individual and combined hazardous air pollutant emissions from all emissions units at this facility shall not exceed 9.9 tons per year and 24.9 tons per year, respectively.

**2. Additional Terms and Conditions**

- 2.a The facility-wide individual and combined hazardous air pollutant (HAP) emissions are effectively limited to less than 10 tons and 25 tons per year, respectively, by limiting the total VOC emissions from K001, K002 and K003.

**B. Operational Restrictions**

1. The maximum annual coating usage for K003 shall not exceed 730 gallons, based upon a rolling, 12-month summation of the coating usage figures.
2. The maximum annual cleanup material usage for K003 shall not exceed 730 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.
3. The permittee shall not employ more than 10 gallons of coatings per day in this emissions unit, pursuant to 3745-21-09(U)(2)(e)(ii).

### C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information.
  - a. The coating usage for each month.
  - b. The cleanup material usage for each month.
  - c. The rolling, 12-month summation of the coating usage figures.
  - d. The rolling, 12-month summation of the cleanup material usage figures.
  - e. The individual HAP and total combined HAP content of each coating and cleanup material employed.
2. The permittee shall collect and record the following information each day for the line:
  - a. The name and identification number of each coating, as applied
  - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.
  - c. The total number of gallons of all coatings employed.
3. The permittee shall collect and record each month the following information for the purpose of determining annual VOC emissions:
  - a. The name and identification of each cleanup material employed.
  - b. The number of gallons of each cleanup material employed.
  - c. The VOC content of each cleanup material, in pounds per gallon and in pounds per gallon excluding water and exempt solvents.
  - d. The total VOC emissions from all coatings and cleanup materials, in tons .

### D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and rolling, 12-month usage limitations for coatings and cleanup materials. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section A.1.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily or monthly record, respectively, showing that the VOC content of any coating and/or cleanup material exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
3. The permittee shall also submit annual reports which specify the total VOC emissions, total emissions of each individual HAP, total coating usage, and total cleanup material usage for K003 for the previous calendar year. These reports shall be submitted by January 31 of each year.

### E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - 1.a Emission limitation:  
The yearly VOC emissions for K003 shall not exceed 4.9 tons per year.

#### Applicable Compliance Method:

Compliance with the 4.9 tons per year shall be determined by the record keeping requirements specified in Section C.

**E. Testing Requirements (continued)**

- 1.b** Emission Limitation:  
6.0 pounds VOC per gallon of coating, excluding water and exempt solvents.

**Applicable Compliance Method:**

Compliance shall be based upon the record keeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used 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.

- 1.c** Emission Limitation:  
7.5 pounds VOC per gallon of cleanup material, excluding water and exempt solvents.

**Applicable Compliance Method:**

Compliance shall be based upon the record keeping requirements specified in Section C. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound contents of the cleanup materials.

**F. Miscellaneous Requirements**

1. Pursuant to OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable:  
A - F.

## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 8/27/99

Facility ID: 01-25-04-1404

Expiration Date: 08/27/04

**FINAL ISSUE**

This document constitutes issuance for:

**WORTHINGTON CYLINDER CORPORATION  
1085 DEARBORN DRIVE  
COLUMBUS, OH 43085-0391**

of a permit to operate for:

**K002 (REFILLABLE PAIN)  
REFILLABLE PAIN**

### **1. Compliance Requirements**

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### **2. Permit to Install Requirement**

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

### **3. Reporting Requirements Related to Monitoring and Recordkeeping 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 quarterly, i.e., 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.)

#### **4. 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 the permit. Such records may be maintained in computerized form.

#### **5. 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 and federal 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.

#### **6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

#### **7. Permit Transfers**

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

#### **8. 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.

#### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

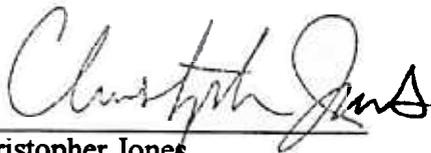
10. The permittee is also subject to the attached special terms and conditions.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Central District Office  
3232 Alum Creek Drive  
PO Box 1049  
Columbus, OH 43216-1049  
(614) 728-3778

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Central District Office.

OHIO ENVIRONMENTAL PROTECTION AGENCY

A handwritten signature in cursive script, appearing to read "Christopher Jones", written over a horizontal line.

Christopher Jones  
Director

**Part II: Special Terms and Conditions**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Pressure cylinder paint line (4BA) with 1.5 MMBtu/hr gas-fired burner used to heat booth make-up air.	OAC Rule 3745-21-09(U)(1)(c)	The emission limitation in this rule is less stringent than PTI No. 01-901.
	OAC Rule 3745-17-11(B)(1)	0.551 pound of particulate emissions per hour.
	OAC Rule 3745-35-07	The volatile organic compound (VOC) emissions from K002 shall not exceed 34.3 tons per year from coating and cleanup material usage based upon a rolling, 12-month summation of the emissions.
	OAC Rule 3745-31-05 PTI No. 01-901	The annual, individual and combined hazardous air pollutant emissions from all emissions units at this facility shall not exceed 9.9 tons per year and 24.9 tons per year, respectively.
		3.3 lbs VOC per gallon of coating excluding water and exempt solvents, as a daily volume-weighted average.
	6.71 lbs VOC per gallon of cleanup material excluding water and exempt solvents.	
OAC Rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.	

**2. Additional Terms and Conditions**

- 2.a The facility-wide individual and combined hazardous air pollutant (HAP) emissions are effectively limited to less than 10 tons and 25 tons per year, respectively, by limiting the total VOC emissions from K001, K002 and K003.

**B. Operational Restrictions**

1. The maximum annual coating usage for K002 shall not exceed 20,000 gallons, based upon a rolling, 12-month summation of the coating usage figures.
2. The maximum annual cleanup material usage for K002 shall not exceed 372 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.

**B. Operational Restrictions (continued)**

3. The permittee shall operate the dry filtration system whenever K002 is in operation.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain monthly records of the following information:
  - a. The coating usage for each month.
  - b. The cleanup material usage for each month.
  - c. The rolling, 12-month summation of the coating usage figures.
  - d. The rolling, 12-month summation of the cleanup material usage figures.
  - e. The individual HAP and total combined HAP content of each coating and cleanup material employed
2. The permittee shall collect and record the following information each day for the line:
  - a. The name and identification number of each coating, as applied
  - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.
3. The permittee shall collect and record each month the following information for the purpose of determining annual VOC emissions:
  - a. The name and identification of each cleanup material employed
  - b. The number of gallons of each cleanup material employed.
  - c. The VOC content of each cleanup material, in pounds per gallon and in pounds per gallon excluding water and exempt solvents.
  - d. The total VOC emissions from all coatings and cleanup materials, in tons.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when K002 was in operation.
5. The volume-weighted average VOC content of all coatings, as applied, shall be calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2 on days when any paint with a VOC content in excess of the applicable limit is applied.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month usage limitations for coatings and cleanup materials. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section A.1.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the VOC content of any coating exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
3. The permittee shall submit annual reports which specify the total VOC emissions, total emissions of each individual HAP, total coating usage, and total cleanup material usage for K002 for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the VOC content of any cleanup material exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
5. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when K002 was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

## E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission limitation:  
The yearly VOC emissions for K002 shall not exceed 34.3 tons per year.

Applicable Compliance Method:  
Compliance with the 34.3 tons per year shall be based upon the record keeping requirements specified in Section C.

1.b Emission Limitation:  
3.3 pounds VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average.

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used 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.

1.c Emission Limitation:  
6.71 pounds VOC per gallon of cleanup material, excluding water and exempt solvents.

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section C. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound contents of the cleanup materials.

1.d Emission limitation:  
The particulate matter emissions shall not exceed 0.551 lb per hour.

Applicable Compliance Method:  
To determine the emissions rate for particulate matter, the following equation shall be used:

$E = \text{maximum coating solids usage rate (pounds/hr)} * (1 - TE) * (1 - CE)$   
Where:

E = particulate matter emissions rate (lbs/hr)  
TE = transfer efficiency of painting equipment in decimal form (use 0.50), transfer efficiency is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used  
CE = control efficiency of the control equipment in decimal form (99% for filters)

1.e Emission Limitation:  
Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method:  
If required, the permittee shall demonstrate compliance with this emission limitation by the method specified in OAC rule 3745-17-03(B)(1)

## F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable:  
A - F.