

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

12/3/2013

Certified Mail

Doug Russell
Brainerd Industries Incorporated
680 Precision Court
Miamisburg, OH 45342

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0857093330
Permit Number: P0113460
Permit Type: Renewal
County: Montgomery

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: RAPCA



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Brainerd Industries Incorporated**

Facility ID:	0857093330
Permit Number:	P0113460
Permit Type:	Renewal
Issued:	12/3/2013
Effective:	12/3/2013
Expiration:	12/3/2018



Division of Air Pollution Control
Permit-to-Install and Operate
for
Brainerd Industries Incorporated

Table of Contents

Authorization	1
A. Standard Terms and Conditions	4
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	5
2. Who is responsible for complying with this permit?	5
3. What records must I keep under this permit?	5
4. What are my permit fees and when do I pay them?.....	5
5. When does my PTIO expire, and when do I need to submit my renewal application?	5
6. What happens to this permit if my project is delayed or I do not install or modify my source?	6
7. What reports must I submit under this permit?	6
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?	6
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	6
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	7
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	7
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	7
13. Can I transfer this permit to a new owner or operator?.....	8
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?	8
15. What happens if a portion of this permit is determined to be invalid?	8
B. Facility-Wide Terms and Conditions.....	9
C. Emissions Unit Terms and Conditions	12
1. R001, parts wiping	13
2. Emissions Unit Group -metal and plastic lines: R002,R003,R004,R005,R006,R008,R009,.....	19
3. Emissions Unit Group -metal lines: K001,K002,R007,.....	23



Final Permit-to-Install and Operate
Brainerd Industries Incorporated
Permit Number: P0113460
Facility ID: 0857093330
Effective Date: 12/3/2013

Authorization

Facility ID: 0857093330
Application Number(s): A0046571
Permit Number: P0113460
Permit Description: FEPTIO renewal permit for a miscellaneous metal and plastic parts coating and silk screening facility.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 12/3/2013
Effective Date: 12/3/2013
Expiration Date: 12/3/2018
Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

This document constitutes issuance to:

Brainerd Industries Incorporated
680 Precision Court
Miamisburg, OH 45342

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

A handwritten signature in black ink, appearing to read "Scott J. Nally".

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0113460

Permit Description: FEPTIO renewal permit for a miscellaneous metal and plastic parts coating and silk screening facility.

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

Emissions Unit ID:	R001
Company Equipment ID:	parts wiping
Superseded Permit Number:	08-04867
General Permit Category and Type:	Not Applicable

Group Name: metal and plastic lines

Emissions Unit ID:	R002
Company Equipment ID:	silk screen printing station & oven
Superseded Permit Number:	08-04867
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R003
Company Equipment ID:	Svecia silk screen printing station & oven
Superseded Permit Number:	08-04867
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R004
Company Equipment ID:	Svecia silk screen printing station & combi-oven
Superseded Permit Number:	08-04867
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R005
Company Equipment ID:	Svecia silk screen printing station & electric oven
Superseded Permit Number:	08-04867
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R006
Company Equipment ID:	Svecia silk screen printing station & electric oven
Superseded Permit Number:	08-04867
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R008
Company Equipment ID:	Cameo Saturn silk screen printing station & oven
Superseded Permit Number:	08-04867
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R009
Company Equipment ID:	Renegade Saturn silk screen printing station & oven
Superseded Permit Number:	08-04867
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Brainerd Industries Incorporated
Permit Number: P0113460
Facility ID: 0857093330
Effective Date: 12/3/2013

Group Name: metal lines

Emissions Unit ID:	K001
Company Equipment ID:	roll coater & oven
Superseded Permit Number:	08-04867
General Permit Category andType:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	roll coater & oven
Superseded Permit Number:	08-04867
General Permit Category andType:	Not Applicable
Emissions Unit ID:	R007
Company Equipment ID:	Svecia silk screen printing station & UV oven
Superseded Permit Number:	08-04867
General Permit Category andType:	Not Applicable



Final Permit-to-Install and Operate
Brainerd Industries Incorporated
Permit Number: P0113460
Facility ID: 0857093330
Effective Date: 12/3/2013

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

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



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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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



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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Final Permit-to-Install and Operate
Brainerd Industries Incorporated
Permit Number: P0113460
Facility ID: 0857093330
Effective Date: 12/3/2013

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. The emissions of hazardous air pollutants (HAPs), as defined in Section 112(b) of Title III of the Clean Air Act, from all the emissions units at this facility, shall not exceed 9.9 tons for any individual HAP and 24.9 tons for any combination of HAPs, on a rolling 12-month basis.
3. The permittee shall keep records for the entire facility each month of the following information:
 - a) The identification of each coating material employed.
 - b) The individual HAP content of each coating material employed, in pounds of individual HAP per gallon, as applied.
 - c) The combined HAP content of each coating material employed, in pounds of combined HAP per gallon [the sum of individual HAP contents from 3.b)], as applied.
 - d) The volume, in gallons, of each coating material employed.
 - e) The identification of each cleanup or solvent wipe material employed.
 - f) The individual HAP content of each cleanup or solvent wipe material employed, in pounds of individual HAP per gallon, as applied.
 - g) The combined HAP content of each cleanup or solvent wipe material employed, in pounds of combined HAP per gallon [the sum of individual HAP contents from 3.f)], as applied.
 - h) The volume, in gallons, of each cleanup or solvent wipe material employed.
 - i) The total individual HAP emissions for each HAP from all coating, cleanup and solvent wipe materials employed [the sum of (3.b) x 3.d) + (3.f) x 3.h)], in tons.
 - j) The total combined HAP emissions from all coating, cleanup and solvent wipe materials employed [the sum of (3.c) x 3.d) + (3.g) x 3.h)], in tons.
 - k) The rolling 12-month sum of the total individual HAP emissions rates for each HAP from all coating, cleanup and solvent wipe materials, in tons, (the sum of individual HAP emissions rates calculated according to 3.i) for the previous 12 months).



Final Permit-to-Install and Operate

Brainerd Industries Incorporated

Permit Number: P0113460

Facility ID: 0857093330

Effective Date: 12/3/2013

- l) The rolling 12-month sum of the total combined HAP emissions rates from all coating and cleanup materials, in tons, (the sum of combined HAP emissions rates calculated according to 3.j) for the previous 12 months).

*A listing of the Hazardous Air Pollutants 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 air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis. combined HAP emissions rates calculated according to 3.e) for the previous 12 months).

4. The permittee shall submit quarterly deviation (excursion) reports, in accordance with Part I of the Standard Terms and Conditions, of this permit, of the following information:

- a) An identification of each month during which the rolling, 12-month individual HAP emissions rate all coating and cleanup materials exceeded 9.9 tons, and the actual rolling, 12-month sum of each individual HAP emissions rate all coating and cleanup materials for each such month.
- b) An identification of each month during which the rolling, 12-month combination of all HAP emissions rates all coating and cleanup materials exceeded 24.9 tons, and the actual rolling, 12-month sum of the combination of all HAP emissions rates all coating and cleanup materials for each such month.

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency). Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

5. The permittee shall submit annual reports that summarize the annual emissions of each individual HAP and the combined emissions of all the HAPs for the facility. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Synthetic Minor Title V Fee Emission Report.



Final Permit-to-Install and Operate
Brainerd Industries Incorporated
Permit Number: P0113460
Facility ID: 0857093330
Effective Date: 12/3/2013

C. Emissions Unit Terms and Conditions



1. R001, parts wiping

Operations, Property and/or Equipment Description:

Solvent parts wiping

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

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

a. b)(1)d.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) as effective November 30, 2001 PTI 08-04867 issued December 18, 2007	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 9.0 pounds per day and 1.64 tons per year. See b)(2)a. and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) as effective December 1, 2006	See b)(2)b.
c.	OAC rule 3745-31-05(D) (Synthetic Minor to Avoid Title V)	See Sections B.2. through B.5.
d.	OAC rule 3745-114-01 and ORC 3704.03(F)	See d)(2) through d)(5) and e)(2).

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph



(A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

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

The Best Available Technology (BAT) requirements of OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this emissions unit because the uncontrolled potential to emit for VOC emissions is less than 10 tons per year.

- c. The hourly and annual VOC emissions limitations for this emissions unit were developed to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping or reporting requirements for these emissions limitations.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in this emissions unit:
 - a. the volume, in gallons, of each solvent wiping material employed during the month;
 - b. the VOC content of each solvent, in pounds VOC per gallon;
 - c. the VOC emissions from all solvents employed, the sum of d)(1)a. multiplied by d)(1)b. for each solvent employed ;

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

- (2) The permit to install for this emissions unit R001 was evaluated based on the actual materials and the design parameters of the emissions units exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from



the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., 24 hours per day and 7 days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: hexane
TLV (mg/m³): 176.24
Maximum Hourly Emission Rate (lbs/hr): 0.243
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 504.5
MAGLC (µg/m³): 4,196.1

The permittee, has demonstrated that emissions of hexane, from emissions unit R001, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).



- (3) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

- (4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and



- d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) **Reporting Requirements**
 - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
 - (2) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
- f) **Testing Requirements**
 - (1) Compliance with the Emissions Limitations specified in b) shall be determined in accordance with the following methods:
 - a. Emissions Limitation –
The VOC emissions from this emissions unit shall not exceed 9.0 pounds per day.
Applicable Compliance Method –
This emissions limitation was developed by multiplying the maximum daily solvent usage of 1.5 gallons per day and a maximum VOC content of 6.0 pounds of VOC per gallon.
 - b. Emissions Limitation –
The VOC emissions from this emissions unit shall not exceed 1.65 tons per year.



Final Permit-to-Install and Operate

Brainerd Industries Incorporated

Permit Number: P0113460

Facility ID: 0857093330

Effective Date: 12/3/2013

Applicable Compliance Method –

This emissions limitation was developed by multiplying the 9.0 pounds per day VOC emissions limitation by the maximum operating schedule of 365 days per year and dividing 2,000 pounds per ton.

g) Miscellaneous Requirements

(1) None.



2. Emissions Unit Group -metal and plastic lines: R002,R003,R004,R005,R006,R008,R009,

EU ID	Operations, Property and/or Equipment Description
R002	silk screen printing press and oven
R003	Svecia silk screen printing press and oven
R004	Svecia silk screen printing press and combi-oven
R005	Svecia silk screen printing press and electric oven
R006	Svecia silk screen printing press and electric oven
R008	Cameo Saturn silk screen printing press and oven
R009	Renegade Saturn silk screen printing press and oven

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) as effective November 30, 2001 PTI 08-04867 issued December 18, 2007	The volatile organic compound (VOC) emissions from each emissions unit shall not exceed 15 pounds per day and 2.74 tons per year. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) as effective December 1, 2006	See b)(2)b.
c.	OAC rule 3745-31-05(D) (Synthetic Minor to Avoid Title V)	See Sections B.2. through B.5.
d.	OAC rule 3745-21-07(M)(4)	See b)(2)c. and b)(2)e.
e.	OAC rule 3745-21-09(U)(2)(e)(i)	See b)(2)d. and b)(2)e.



(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

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

The Best Available Technology (BAT) requirements of OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this emissions unit because the uncontrolled potential to emit for VOC emissions is less than 10 tons per year.

c. The VOC emissions shall not exceed 3 pounds per hour and 15 pounds per day, including coating and cleanup materials when using organic material or substance containing liquid organic material that comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. In accordance with OAC rule 3745-21-07(M)(5)(b), the provisions of OAC rule 3745-21-07(M)(4) shall not apply to the emission from any material used in any article, machine, equipment or other contrivance if the emission is not a VOC.

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

e. For these emissions units the emissions limitations of OAC rule 3745-21-07(M)(4) are more stringent than the emissions limitation of OAC rule 3745-21-09(U)(2)(e)(i) and therefore only one set of record keeping is necessary for these emissions units.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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



- a. the company identification for 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, in pounds VOC per gallon;
 - d. the total VOC emissions rate for all coatings and cleanup materials, in pounds per day, the sum of d(1)b. multiplied d)(1)c. for all coatings and cleanup materials;
 - e. the time, in hours, that the emissions unit was in operation; and
 - f. the average hourly VOC emissions rate for all coatings and cleanup materials, d)(1)d. divided by d)(1)e. for each emissions unit.
- (2) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in this emissions unit:
- a. the VOC emissions from all coatings and cleanup materials, the sum of daily VOC emissions from each emissions unit in d)(1)d. for all coatings and cleanup materials for each calendar month.

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

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that any emissions unit employs more than eight gallons of coating per day. 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.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (3) The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total VOC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data for each emissions unit in the annual Fee Emission Report.



f) Testing Requirements

(1) Compliance with the Emissions Limitations specified in b) shall be determined in accordance with the following methods:

a. Emissions Limitation –

The VOC emissions from each emissions unit shall not exceed 15 pounds day.

Applicable Compliance Method –

This emissions limitation is based on compliance with OAC rule 3745-21-07(M)(4). Compliance is demonstrated based on the record keeping requirements of d)(1).

b. Emissions Limitation –

The VOC emissions from each emissions unit shall not exceed 2.74 tons per year.

Applicable Compliance Method –

This emissions limitation based on compliance with the daily emissions limitation and 365 days per year of operation. Compliance is demonstrated based on the record keeping requirements of d)(2).

c. Emissions Limitation –

The VOC emissions from each emissions unit shall not exceed 3 pounds per hour.

Applicable compliance Method –

Compliance is demonstrated based on the record keeping requirements of d)(1).

g) Miscellaneous Requirements

(1) None.



3. Emissions Unit Group -metal lines: K001,K002,R007,

EU ID	Operations, Property and/or Equipment Description
K001	roll coater and oven
K002	Black Brothers roll coater and oven
R007	Svecia silk screen printing press and UV oven

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

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

a. b)(1)f.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 08-04867 issued December 18, 2007	<u>Emissions Unit K001 and K002:</u> The volatile organic compound (VOC) emissions from each emissions unit shall not exceed 5.48 pounds per hour, 87.7 pounds per day and 16.0 tons per year. <u>Emissions Unit R007:</u> The VOC emissions from this emissions unit shall not exceed 27.2 pounds per day and 4.97 tons per year. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3) as effective November 30, 2001 PTI 08-04867 issued December 18, 2007	See b)(2)a. through b)(2)c.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(A)(3)(a)(ii) as effective December 1, 2006	See b)(2)d.
d.	OAC rule 3745-31-05(D) (Synthetic Minor to Avoid Title V)	See Sections B.2. through B.5.
e.	OAC rule 3745-21-09(U)(2)(e)(i)	See b)(2)b.
f.	OAC rule 3745-114-01 and ORC 3704.03(F)	See d)(3) through d)(6).

(2) Additional Terms and Conditions

- a. The hourly VOC emissions limitation for emissions units K001 and K002 were developed to reflect the potential to emit for each emissions unit. Therefore, it is not necessary to develop monitoring, record keeping or reporting requirements for this emissions limitation.

The daily VOC emissions limitation for emissions unit R007 was developed to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping or reporting requirements for this emissions unit.

- b. The permittee shall not employ more than eight gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.
- c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements of OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from emissions unit R007 because the uncontrolled potential to emit for VOC emissions is less than 10 tons per year.



- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect and record the following information for each day for each emissions unit:
 - a. The identification for 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, in pounds VOC per gallon.
 - d. The VOC emissions rate for all coatings and cleanup materials, in pounds per day, the sum of d)(1)b. multiplied by d)(1)c. for all coatings and cleanup materials employed.
 - (2) The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials for each emissions unit, the sum of the daily VOC emission rates from d)(1)d. for the calendar year.
 - (3) The permit to install for emissions units K001 and K002 were evaluated based on the actual materials and the design parameters of the emissions unit's(s) exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold



Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., 24 hours per day and 7 days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: methyl isobutyl ketone

TLV (mg/m³): 204.83

Maximum Hourly Emission Rate (lbs/hr): 0.772

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 214.2

MAGLC (µg/m³): 4,876.8

Toxic Contaminant: xylene

TLV (mg/m³): 434.19

Maximum Hourly Emission Rate (lbs/hr): 0.386

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 107.1

MAGLC (µg/m³): 10,337.9

Toxic Contaminant: isophorone

TLV (mg/m³): 28.26

Maximum Hourly Emission Rate (lbs/hr): 0.772

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 214.2

MAGLC (µg/m³): 673.0

The permittee, has demonstrated that emissions of methyl isobutyl ketone, xylene, and isophorone from emissions units K001 and K002, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:



- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.



- (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that any of the coating lines (K001, K002 or R007) employed more than the 8 gallons coating per day. 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 an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (3) The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total VOC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for each emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data for each emissions unit in the annual Fee Emission Report.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations in b) of be determined in accordance with the following methods:

a. Emissions Limitation –

Emissions Units K001 and K002:

The VOC emissions from each emissions unit shall not exceed 5.48 pounds per hour.

Applicable Compliance Method –

This emissions limitation was developed by multiplying the maximum hourly coating application rate (0.375 gallon) multiplied by the maximum VOC content of the coatings applied (7.08 pounds VOC per gallon) plus the maximum VOC emissions from cleanup materials (0.375 gallon x 7.53 pounds VOC per gallon).



b. Emissions Limitation -

Emissions Units K001 and K002:

The VOC emissions from each emissions unit shall not exceed 87.7 pounds per day.

Applicable Compliance Method –

Compliance shall be based on the record keeping requirements of d)(1).

c. Emissions Limitation –

Emissions Units K001 and K002:

The VOC emissions from each emissions unit shall not exceed 16.0 tons per year.

Applicable Compliance Method –

Compliance shall be based on the record keeping requirements of d)(2).

d. Emissions Limitation –

Emissions Unit R007:

The VOC emissions from this emissions unit shall not exceed 27.2 pounds per day.

Applicable Compliance Method –

This emissions limitation was developed by multiplying the maximum daily coating application rate (3 gallons) multiplied by the maximum VOC content of the coatings applied (5.3 pounds VOC per gallon) plus the maximum VOC emissions from cleanup materials (1.5 gallons x 7.53 pounds VOC per gallon).

e. Emissions Limitation -

Emissions Unit R007:

The VOC emissions from this emissions unit shall not exceed 4.97 tons per year.

Applicable Compliance Method -

Compliance shall be based on the record keeping requirements of d)(2).

f. Emissions Limitation –

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



Final Permit-to-Install and Operate

Brainerd Industries Incorporated

Permit Number: P0113460

Facility ID: 0857093330

Effective Date: 12/3/2013

Applicable Compliance Method –

Compliance shall be based on the record keeping requirements of d)(2).

g) Miscellaneous Requirements

(1) None.