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

12/18/2013

Certified Mail

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

Mr. DAVID MODROWSKI
UNION TANK CAR CO.
175 W JACKSON BLVD
CHICAGO, IL 60604

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0351010025
Permit Number: P0111559
Permit Type: Administrative Modification
County: Marion

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 Ohio EPA DAPC, Northwest District Office at (419)352-8461or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-NWDO

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
UNION TANK CAR CO.

Facility ID:	0351010025
Permit Number:	P0111559
Permit Type:	Administrative Modification
Issued:	12/18/2013
Effective:	12/18/2013
Expiration:	9/6/2016

Division of Air Pollution Control
Permit-to-Install and Operate
for
UNION TANK CAR CO.

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Authorization

Facility ID:	0351010025
Application Number(s):	M0001919, A0048421
Permit Number:	P0111559
Permit Description:	Modification of K001 to correct short term limit and correct gallon/hr usage limit.
Permit Type:	Administrative Modification
Permit Fee:	$100.00
Issue Date:	12/18/2013
Effective Date:	12/18/2013
Expiration Date:	9/6/2016

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

UNION TANK CAR CO.
939 HOLLAND AVE
MARION, OH 43302

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

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

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0111559
Permit Description: Modification of K001 to correct short term limit and correct gallon/hr usage limit.

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

Emissions Unit ID:	**K001**
Company Equipment ID:	Paint booth w/oven
Superseded Permit Number:	P0087313
General Permit Category and Type:	Not Applicable

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 beingpermanently shut down without first applying for and obtaining a permit pursuantto 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.

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.

C. Emissions Unit Terms and Conditions

1. K001, Paint booth w/oven

Operations, Property and/or Equipment Description:

Paint spray booth with dry filtration

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. d)(4), d)(5) and d)(6).

(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. b)(1)b., b(2)b., c)(1), d)(1), d)(2), d)(3), e)(2), f)(1)d., f)(1)e. and f)(1)f.

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)	Emissions of volatile organic compounds (VOC) shall not exceed 70.0 pounds per hour from the coating operations. Emissions of VOC shall not exceed 751.7 pounds per month and 4.51 tons per year from the cleanup operations. See b)(2)a.
b.	OAC rule 3745-31-05(D)	Emissions of VOC shall not exceed 52.50 tons per rolling, 12-month period from the coating operations. Emissions of hazardous air pollutants (HAPs), from emissions units K001 and P002, combined, shall not exceed 9.90 tons per rolling 12-month period for any

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs. See b)(2)b. and c)(1).
c.	OAC rule 3745-21-09(U)(1)(d)	Emissions of VOC shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d) and OAC rule 3745-31-05(D).

b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 52.50 tons VOC per rolling 12-month period based on coating usage restrictions [see c)(1)] and a maximum coating VOC content of 3.5 lbs/gal established by OAC rule 3745-21-09(U)(1)(d); and

ii. Annual HAP emissions from emissions units K001 and P002 combined shall not exceed 9.90 tons per rolling 12-month period for any individual HAP and 24.90 tons per rolling 12-month period for any combination of HAPs.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.

c) Operational Restrictions

(1) The maximum annual coating usage rate for this emissions unit shall not exceed 30,000 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates. The permittee shall use existing records to determine compliance upon commencing operation under the provisions of this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for all coatings employed in this emissions unit:

a. the name and identification number of each coating employed;

b. the VOC content of each coating, as applied, in pounds per gallon;

c. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied;

d. the amount of each individual HAP in each coating, in pounds per gallon, as applied;

e. the number of gallons of each coating employed;

f. the total number of gallons of all coatings employed [summation of d)(1)e.];

g. the annual coating usage, in gallons, for all coatings employed, based upon a rolling 12-month summation of the monthly usage rates;

h. the VOC emission rate for each coating [d)(1)b. x d)(1)e.], in pounds;

i. the total VOC emission rate for all coatings [summation of d)(1)h.], in pounds or tons

j. the annual VOC emissions, in tons, from all coatings, based upon a rolling 12-month summation of the monthly VOC emissions

k. the emission rate for each individual HAP from each coating employed [d)(1)d. x d)(1)e.], in pounds per month;

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

(2) The permittee shall collect and record the following each month for cleanup operations:

a. the name and identification of each cleanup material employed;

b. the VOC content of each cleanup material employed, in pounds per gallon;

c. the amount of each individual HAP in each cleanup material employed, in pounds per gallon;

d. the number of gallons of each cleanup material employed;

e. the VOC emissions from each cleanup material employed [d)(2)b. x d)(2)d. x (1-%captured) the % captured is 80%], in pounds;

f. the total VOC emissions from all cleanup materials employed [summation of d)(2)e.], in pounds or tons;

g. the annual year to date VOC emissions from cleanup operations, in tons per year [summation of d)(2)f. for each calendar month to date from January to December]; and

h. the emission rate for each individual HAP from each cleanup material employed [d)(2)c. x d)(2)d.], in pounds per month.

(3) The permittee shall collect and record the following HAP information each month for emission units K001 and P002 combined:

a. the total emission rate for each individual HAP from all coatings and cleanup materials employed in emissions unit K001 and individual HAP emitted from emissions unit P002 (rail car cleaning operation with flare), in pounds per month (summation of the individual HAPs quantified in d)(1)k., d)(2)h. and from emissions unit P002*);

*Quantification of HAP emissions from the railcar cleaning operation are required in the monitoring and recordkeeping section of the permit for emissions unit P002.

b. the total HAP emission rate for all HAPs combined from all coatings and cleanup materials employed in emissions unit K001 and total HAPs emitted from emissions unit P002 [summation of all individual HAPs quantified in d)(3)a.], in tons per month; and

c. the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of monthly HAP emissions.

(4) The Permit to Install for emissions units K001 and P002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the Permit to Install application and the Screen3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the Screen3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

a. Pollutant: ethylbenzene

TLV (µg/m3): 8683
Maximum Hourly Emission Rate (lbs/hr): 5.54
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 453
MAGLC (µg/m3): 2067

b. Pollutant: methyl isobutyl ketone

TLV (µg/m3): 81930
Maximum Hourly Emission Rate (lbs/hr): 21.2
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 1716
MAGLC (µg/m3): 1950

c. Pollutant: toluene

TLV (µg/m3): 75361
Maximum Hourly Emission Rate (lbs/hr): 14.6
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 1183
MAGLC (µg/m3): 1794

d. Pollutant: diethylene glycol monomethyl ether

TLV (µg/m3): 96662
Maximum Hourly Emission Rate (lbs/hr): 24.3
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 1968
MAGLC (µg/m3): 2301

e. Pollutant: ethylene glycol monobutyl ether acetate

TLV (µg/m3): 131042
Maximum Hourly Emission Rate (lbs/hr): 16.92
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 1376
MAGLC (µg/m3): 3120

f. Pollutant: xylene

TLV (µg/m3): 434192
Maximum Hourly Emission Rate (lbs/hr): 33.2
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 2690
MAGLC (µg/m3): 10337

g. Pollutant: n-butyl alcohol

TLV (µg/m3): 60629
Maximum Hourly Emission Rate (lbs/hr): 15.4
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 1247
MAGLC (µg/m3): 1443

h. Pollutant: MEK

TLV (µg/m3): 589775
Maximum Hourly Emission Rate (lbs/hr): 1872
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 1532
MAGLC (µg/m3): 14042

i. Pollutant: cumene

TLV (µg/m3): 245787
Maximum Hourly Emission Rate (lbs/hr): 2.18
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 179
MAGLC (µg/m3): 5852

j. Pollutant: butyl acetate

TLV (µg/m3): 712638
Maximum Hourly Emission Rate (lbs/hr): 41.96
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 3399
MAGLC (µg/m3): 16967

k. Pollutant: ethanol

TLV (µg/m3): 188425
Maximum Hourly Emission Rate (lbs/hr): 1.48
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 111
MAGLC (µg/m3): 44863

l. Pollutant: isobutyl alcohol

TLV (µg/m3): 151574
Maximum Hourly Emission Rate (lbs/hr): 2.14
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 177
MAGLC (µg/m3): 3608

m. Pollutant: Stoddard solvent

TLV (µg/m3): 572597
Maximum Hourly Emission Rate (lbs/hr): 10.82
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 874
MAGLC (µg/m3): 13633

n. Pollutant: propylene glycol monomethyl ether

TLV (µg/m3): 368,589
Maximum Hourly Emission Rate (lbs/hr): 14.4
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 1167
MAGLC (µg/m3): 8776

o. Pollutant: methyl propyl ketone

TLV (µg/m3): 528650
Maximum Hourly Emission Rate (lbs/hr): 20.4
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 1652
MAGLC (µg/m3): 12586

p. Pollutant: methyl amyl ketone

TLV (µg/m3): 233496
Maximum Hourly Emission Rate (lbs/hr): 25.4
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 2058
MAGLC (µg/m3): 5559

q. Pollutant: 2,4-pentanedione

TLV (µg/m3): 102372
Maximum Hourly Emission Rate (lbs/hr): 3.4
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 276
MAGLC (µg/m3): 2437

r. Pollutant: naphthalene

TLV (µg/m3): 52429
Maximum Hourly Emission Rate (lbs/hr): 1.5
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 122
MAGLC (µg/m3): 1248

s. Pollutant: iso-butyl acetate

TLV (µg/m3): 712638
Maximum Hourly Emission Rate (lbs/hr): 2.8
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 228
MAGLC (µg/m3): 16967

t. Pollutant: cyclohexanone

TLV (µg/m3): 80278
Maximum Hourly Emission Rate (lbs/hr): 7.34
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 598
MAGLC (µg/m3): 1911

u. Pollutant: di-isobutyl ketone

TLV (µg/m3): 145429
Maximum Hourly Emission Rate (lbs/hr): 5.16
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 421
MAGLC (µg/m3): 3462

v. Pollutant: acetone

TLV (µg/m3): 118711
Maximum Hourly Emission Rate (lbs/hr): 25.22
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 2041
MAGLC (µg/m3): 28264

w. Pollutant: tertbutyl acetate

TLV (µg/m3): 950184
Maximum Hourly Emission Rate (lbs/hr): 80.2
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 1271
MAGLC (µg/m3): 22623

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

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

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

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

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

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

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

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

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 eBusiness 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 quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. 52.50 tons of VOC per rolling, 12-month period;

ii. the maximum annual coating usage rate of 30,000 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates;

iii. the 9.90 tons per rolling, 12-month period for any individual HAP; and

iv. the 24.90 tons per rolling, 12-month period for any combination of HAPs.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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, electronically through Ohio EPA Air Services, 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).

(3) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (coating that exceeds the 3.50 lbs of VOC/gallon excluding water and exempt solvents) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

(4) 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.

f) Testing Requirements

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

a. Emission Limitation:

Emissions of VOC shall not exceed 70.0 pounds per hour from the coating operations.

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 20 gallons per hour and a maximum VOC content of 3.50 pounds per gallon.

b. Emission Limitations:

Emissions of VOC shall not exceed 751.7 pounds per month and 4.51 tons per year from the cleanup operations.

Applicable Compliance Method:

Compliance with the above emission limitations shall be based upon the recordkeeping requirements specified in section d)(2).

c. Emission Limitation:

Emissions of VOC shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in section d)(1). Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

d. Emission Limitation:

Emissions of VOC shall not exceed 52.50 tons per rolling, 12-month period from the coating operations.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in section d)(1).

e. Emission Limitations:

Emissions of HAPs, from emissions units K001 and P002, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in section d)(3).

f. Emission Limitation:

The maximum annual coating usage rate for this emissions unit shall not exceed 30,000 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in section d)(1).

g) Miscellaneous Requirements

(1) None.