



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

06/14/04

CERTIFIED MAIL

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

K005 (F50-66W) Paint spray booth

Moyno Industrial Products (08-12-10-0350)

Scott F. Wilson

1895 W. Jefferson Street

Springfield, OH 45506

Dear Scott F. Wilson

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

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact RAPCA.

Sincerely,

Michael W. Ahern

Permit Issuance and Data Management Section

Division of Air Pollution Control

cc: RAPCA



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 06/14/04

Expiration Date: 06/14/09

This document constitutes issuance to:

Facility ID: 08-12-10-0350
Moyno Industrial Products
1895 W. Jefferson St.
Springfield, OH 45506

of a permit to operate for:

K005 (F50-66W)
Paint spray booth

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

RAPCA
117 South Main Street
Dayton, OH 45422-1280
(937) 225-4435

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

A handwritten signature in black ink, appearing to read "Christopher Jones". The signature is written in a cursive style and is positioned above a horizontal line.

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

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

2. Permit to Install Requirement

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

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

4. Records Retention Requirements

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

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether

cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

RAPCA
117 South Main Street
Dayton, OH 45422-1280
(937) 225-4435

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K005 - DeVilbiss XSWG520 paint booth; misc. metal parts	OAC rule 3745-31-05(A)(3) PTI# 08-1800	<p>Volatile organic compound (VOC) emissions shall not exceed 41.2 lbs/day, excluding cleanup.</p> <p>VOC emissions shall not exceed 5.0 TPY, excluding cleanup.</p> <p>See A.2.a for the combined cleanup material VOC emissions limitation.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(i).</p> <p>See B.1.</p> <p>The maximum daily coating usage shall not exceed 8 gallons of coatings in any one day.</p>
	<p>OAC rule 3745-35-07</p> <p>OAC rule 3745-21-09(U)(2)(e)(i)</p>	

2. Additional Terms and Conditions

- 2.a The combined VOC emissions from cleanup material for emissions units K005, K007, K008, K009, K010 R002, and R005 shall not exceed 8.88 TPY.
- 2.b The 41.2 lbs /day VOC limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any individual HAP and 24.9 TPY for the combination of all HAPs, based upon rolling, 12-month summations.

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

Month(s)	Maximum Allowable Cumulative Emissions of Individual HAPs (Tons)	Maximum Allowable Cumulative Emissions of Combined HAPs (Tons)
1	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23
1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60
1-9	7.43	18.68
1-10	8.25	20.75
1-11	9.08	22.83
1-12	9.90	24.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for any individual HAP and combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit.
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed
 - c. The total volume, in gallons, of all of the coatings employed.
2. The permittee shall collect and record the following information each month for emissions units K005, K007, K008, K009, K010, R002, and R005 for the purpose of determining annual VOC emissions from cleanup materials usage:
 - a. The name and identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed
 - c. The VOC content of each cleanup material, in pounds per gallon.
 - d. The number of gallons of each cleanup material disposed of as waste or recycled
 - e. The VOC content of each cleanup material disposed of as waste or recycled, in pounds per gallon
 - f. The total VOC emissions from all cleanup materials employed, in tons (for all cleanup materials, the sum of (b) times (c) minus the sum of (d) times (e), divided by 2000 lbs/ton).

C. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each month for this emissions unit for the purpose of determining annual VOC emissions:
 - a. The name and identification of each coating employed
 - b. The number of gallons of each coating employed
 - c. The VOC content of each coating, as applied, in pounds per gallon and in pounds per gallon excluding water and exempt solvents.
 - d. The total VOC emissions from all coatings and cleanup materials employed, in tons (for all coatings, the sum of (b) times (c), plus for all cleanup materials, the sum of (C.2.b) times (C.2.c) minus the sum of (C.2.d) times (C.2.e), divided by 2000 lbs/ton).
4. The permittee shall collect and record the following information each month for the entire facility:
 - a. The name and identification number of each coating material employed
 - b. The individual hazardous air pollutant (HAP)* content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.
 - c. The total combined HAPs content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from (b)).
 - d. The number of gallons of each coating material employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from (f)).
 - h. The number of gallons of each cleanup material employed
 - i. The individual HAP content for each HAP of each recycled and waste cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - j. The total combined HAPs content of each recycled and waste cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from (f)).
 - k. The number of gallons of each recycled and waste cleanup material employed
 - l. The total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons per month (for each HAP, the sum of (b) times (d) for each coating material plus the sum of (f) times (h) for each cleanup material, minus the sum of (i) times (k) for each recycled and waste cleanup material, divided by 2000 lbs/ton).

C Monitoring and/or Record Keeping Requirements (continued)

m. The total combined HAPs emissions from all coating materials and cleanup materials employed, in tons per month (the sum of (c) times (d) for each coating material plus the sum of (g) times (h) for each cleanup material, minus the sum of (j) times (k) for each recycled and waste cleanup material, divided by 2000 lbs/ton).

n. During the first 12 calendar months of operation following the issuance of this permit, the cumulative individual HAP emissions for each calendar month, in tons.

o. Beginning after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons.

p. During the first 12 calendar months of operation following the issuance of this permit, the cumulative combined HAPs emissions for each calendar month, in tons.

q. Beginning after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined HAPs emissions from all coating materials and cleanup materials employed, in tons.

*A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line by line basis.

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 the coating line employed more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports which specify the individual HAP emissions from the facility, the combined HAPs emissions from the facility, and the total VOC emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports, in accordance with General Term and Condition 3.b, that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in Section B.1. of these terms and conditions.
4. The permittee shall submit deviation (excursion) reports, in accordance with General Term and Condition 3.b, that identify all exceedances of the rolling, 12-month emission limitation for combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in Section B.1. of these terms and conditions.

E. Testing Requirements

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

- a. Emission Limitation-
8 gals/day of coatings

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section C.1

- b. Emission Limitation-
41.2 lbs/day VOC

Applicable Compliance Method-
Compliance shall be determined by multiplying the maximum coating usage per day (8 gal/day) by the maximum VOC content of the coatings (5.15 lbs VOC/gal).

- c. Emission Limitation-
5.0 TPY VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in Sections C.2. and C.3. and shall be the sum of the twelve monthly VOC emission rates for the calendar year.

- d. Emission Limitation-
8.88 TPY cleanup material emissions for emissions units K005, K007, K008, K009, K010, R002, and R005, combined

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

- e. Emission Limitation-
9.9 TPY individual HAP emissions, facility-wide, based upon rolling 12-month summations

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section C.4. for each individual HAP with the addition of total chromium emissions from emissions unit P021.

- f. Emission Limitation-
24.9 TPY combined HAP emissions, facility-wide, based upon rolling 12-month summations

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section C.4. for combined HAPs with the addition of total chromium emissions from emissions unit P021.

2. Formulation data shall be used to determine the VOC and HAP contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. The terms and conditions in sections A, B, C, D, E, and F of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address

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

06/14/04

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

K007 (F61-RKL4800) Paint spray booth

Moyno Industrial Products (08-12-10-0350)

Scott F. Wilson
1895 W. Jefferson Street
Springfield, OH 45506

Dear Scott F. Wilson:

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

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact RAPCA.

Sincerely,

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

cc: RAPCA



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 06/14/04

Expiration Date: 06/14/09

This document constitutes issuance to:

Facility ID: 08-12-10-0350
Moyno Industrial Products
1895 W. Jefferson St.
Springfield, OH 45506

of a permit to operate for:

K007 (F61-RKL4800)
Paint spray booth

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

RAPCA
117 South Main Street
Dayton, OH 45422-1280
(937) 225-4435

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

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

2. Permit to Install Requirement

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

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

4. Records Retention Requirements

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

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of

a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9 Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

RAPCA
117 South Main Street
Dayton, OH 45422-1280
(937) 225-4435

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K007 - F-61, small pump paint booth; misc. metal parts	OAC rule 3745-31-05(A)(3) PTI# 08-1800	Volatile organic compound (VOC) emissions shall not exceed 41.2 lbs/day, excluding cleanup.
		VOC emissions shall not exceed 5.0 TPY, excluding cleanup.
		See A.2.a for the combined cleanup material VOC emissions limitation.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(i).
	OAC rule 3745-35-07	See B.1.
	OAC rule 3745-21-09(U)(2)(e)(i)	The maximum daily coating usage shall not exceed 8 gallons of coatings in any one day.

2. Additional Terms and Conditions

- 2.a The combined VOC emissions from cleanup material for emissions units K005, K007, K008, K009, K010 R002, and R005 shall not exceed 8.88 TPY.
- 2.b The 41.2 lbs /day VOC limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any individual HAP and 24.9 TPY for the combination of all HAPs, based upon rolling, 12-month summations.

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

Month(s)	Maximum Allowable Cumulative Emissions of Individual HAPs (Tons)	Maximum Allowable Cumulative Emissions of Combined HAPs (Tons)
1	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23
1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60
1-9	7.43	18.68
1-10	8.25	20.75
1-11	9.08	22.83
1-12	9.90	24.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for any individual HAP and combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all of the coatings employed.
2. The permittee shall collect and record the following information each month for emissions units K005, K007, K008, K009, K010, R002, and R005 for the purpose of determining annual VOC emissions from cleanup materials usage:
 - a. The name and identification of each cleanup material employed
 - b. The number of gallons of each cleanup material employed
 - c. The VOC content of each cleanup material, in pounds per gallon
 - d. The number of gallons of each cleanup material disposed of as waste or recycled
 - e. The VOC content of each cleanup material disposed of as waste or recycled, in pounds per gallon.
 - f. The total VOC emissions from all cleanup materials employed, in tons (for all cleanup materials, the sum of (b) times (c) minus the sum of (d) times (e), divided by 2000 lbs/ton).

C. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each month for this emissions unit for the purpose of determining annual VOC emissions:
 - a. The name and identification of each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The VOC content of each coating, as applied, in pounds per gallon and in pounds per gallon excluding water and exempt solvents.
 - d. The total VOC emissions from all coatings and cleanup materials employed, in tons (for all coatings, the sum of (b) times (c), plus for all cleanup materials, the sum of (C.2.b) times (C.2.c) minus the sum of (C.2.d) times (C.2.e), divided by 2000 lbs/ton).
4. The permittee shall collect and record the following information each month for the entire facility:
 - a. The name and identification number of each coating material employed.
 - b. The individual hazardous air pollutant (HAP)* content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.
 - c. The total combined HAPs content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from (b)).
 - d. The number of gallons of each coating material employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from (f)).
 - h. The number of gallons of each cleanup material employed.
 - i. The individual HAP content for each HAP of each recycled and waste cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - j. The total combined HAPs content of each recycled and waste cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from (f)).
 - k. The number of gallons of each recycled and waste cleanup material employed.
 - l. The total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons per month (for each HAP, the sum of (b) times (d) for each coating material plus the sum of (f) times (h) for each cleanup material, minus the sum of (i) times (k) for each recycled and waste cleanup material, divided by 2000 lbs/ton).

C Monitoring and/or Record Keeping Requirements (continued)

m. The total combined HAPs emissions from all coating materials and cleanup materials employed, in tons per month (the sum of (c) times (d) for each coating material plus the sum of (g) times (h) for each cleanup material, minus the sum of (j) times (k) for each recycled and waste cleanup material, divided by 2000 lbs/ton).

n. During the first 12 calendar months of operation following the issuance of this permit, the cumulative individual HAP emissions for each calendar month, in tons.

o. Beginning after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons.

p. During the first 12 calendar months of operation following the issuance of this permit, the cumulative combined HAPs emissions for each calendar month, in tons.

q. Beginning after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined HAPs emissions from all coating materials and cleanup materials employed, in tons.

*A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line by line basis.

D. 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 the coating line employed more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports which specify the individual HAP emissions from the facility, the combined HAPs emissions from the facility, and the total VOC emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports, in accordance with General Term and Condition 3.b, that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in Section B.1. of these terms and conditions.
4. The permittee shall submit deviation (excursion) reports, in accordance with General Term and Condition 3.b, that identify all exceedances of the rolling, 12-month emission limitation for combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in Section B.1. of these terms and conditions.

E Testing Requirements

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

- a. Emission Limitation-
8 gals/day of coatings

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section C.1

- b. Emission Limitation-
41.2 lbs/day VOC

Applicable Compliance Method-
Compliance shall be determined by multiplying the maximum coating usage per day (8 gal/day) by the maximum VOC content of the coatings (5.15 lbs VOC/gal).

- c. Emission Limitation-
5.0 TPY VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in Sections C.2. and C.3. and shall be the sum of the twelve monthly VOC emission rates for the calendar year.

- d. Emission Limitation-
8.88 TPY cleanup material emissions for emissions units K005, K007, K008, K009, K010, R002, and R005, combined

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

- e. Emission Limitation-
9.9 TPY individual HAP emissions, facility-wide, based upon rolling 12-month summations

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section C.4. for each individual HAP with the addition of total chromium emissions from emissions unit P021.

- f. Emission Limitation-
24.9 TPY combined HAP emissions, facility-wide, based upon rolling 12-month summations

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section C.4. for combined HAPs with the addition of total chromium emissions from emissions unit P021.

2. Formulation data shall be used to determine the VOC and HAP contents of the coatings and cleanup materials.

F Miscellaneous Requirements

1. The terms and conditions in sections A, B, C, D, E, and F of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

06/14/04

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

K008 (F19-66R) Spray booth [adhesive]

Moyno Industrial Products (08-12-10-0350)
Scott F. Wilson
1895 W. Jefferson Street
Springfield, OH 45506

Dear Scott F. Wilson:

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

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact RAPCA.

Sincerely,

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

cc: RAPCA



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 06/14/04

Expiration Date: 06/14/09

This document constitutes issuance to

Facility ID: 08-12-10-0350
Moyno Industrial Products
1895 W. Jefferson St.
Springfield, OH 45506

of a permit to operate for:

K008 (F19-66R)
Spray booth [adhesive]

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

RAPCA
117 South Main Street
Dayton, OH 45422-1280
(937) 225-4435

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1 Compliance Requirements

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

2. Permit to Install Requirement

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

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

4. Records Retention Requirements

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

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of

a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

RAPCA
117 South Main Street
Dayton, OH 45422-1280
(937) 225-4435

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K008 - F-19 stator tube paint booth; misc. metal parts	OAC rule 3745-31-05(A)(3) PTI# 08-2492	<p>Volatile organic compound (VOC) emissions shall not exceed 52.7 lbs/day, excluding cleanup.</p> <p>VOC emissions shall not exceed 6.50 TPY, excluding cleanup.</p> <p>See A.2.a for the combined cleanup material VOC emissions limitation.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(i).</p> <p>See B.1.</p>
	<p>OAC rule 3745-35-07</p> <p>OAC rule 3745-21-09(U)(2)(e)(i)</p>	<p>The maximum daily coating usage shall not exceed 8 gallons of coatings in any one day.</p>

2 Additional Terms and Conditions

- 2.a The combined VOC emissions from cleanup material for emissions units K005, K007, K008, K009, K010, R002, and R005 shall not exceed 8.88 TPY.
- 2.b The 52.7 lbs /day VOC limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any individual HAP and 24.9 TPY for the combination of all HAPs, based upon rolling, 12-month summations.

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

Month(s)	Maximum Allowable Cumulative Emissions of Individual HAPs (Tons)	Maximum Allowable Cumulative Emissions of Combined HAPs (Tons)
1	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23
1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60
1-9	7.43	18.68
1-10	8.25	20.75
1-11	9.08	22.83
1-12	9.90	24.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for any individual HAP and combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating employed
 - b. The volume, in gallons, of each coating employed
 - c. The total volume, in gallons, of all of the coatings employed.
2. The permittee shall collect and record the following information each month for emissions units K005, K007, K008, K009, K010, R002, and R005 for the purpose of determining annual VOC emissions from cleanup materials usage:
 - a. The name and identification of each cleanup material employed
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content of each cleanup material, in pounds per gallon
 - d. The number of gallons of each cleanup material disposed of as waste or recycled
 - e. The VOC content of each cleanup material disposed of as waste or recycled, in pounds per gallon.
 - f. The total VOC emissions from all cleanup materials employed, in tons (for all cleanup materials, the sum of (b) times (c) minus the sum of (d) times (e), divided by 2000 lbs/ton).

C Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each month for this emissions unit for the purpose of determining annual VOC emissions:
 - a. The name and identification of each coating employed
 - b. The number of gallons of each coating employed
 - c. The VOC content of each coating, as applied, in pounds per gallon and in pounds per gallon excluding water and exempt solvents.
 - d. The total VOC emissions from all coatings and cleanup materials employed, in tons (for all coatings, the sum of (b) times (c), plus for all cleanup materials, the sum of (C.2.b) times (C.2.c) minus the sum of (C.2.d) times (C.2.e), divided by 2000 lbs/ton).
4. The permittee shall collect and record the following information each month for the entire facility:
 - a. The name and identification number of each coating material employed
 - b. The individual hazardous air pollutant (HAP)* content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.
 - c. The total combined HAPs content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from (b)).
 - d. The number of gallons of each coating material employed
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from (f)).
 - h. The number of gallons of each cleanup material employed
 - i. The individual HAP content for each HAP of each recycled and waste cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - j. The total combined HAPs content of each recycled and waste cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from (f)).
 - k. The number of gallons of each recycled and waste cleanup material employed
 - l. The total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons per month (for each HAP, the sum of (b) times (d) for each coating material plus the sum of (f) times (h) for each cleanup material, minus the sum of (i) times (k) for each recycled and waste cleanup material, divided by 2000 lbs/ton).

C. Monitoring and/or Record Keeping Requirements (continued)

m. The total combined HAPs emissions from all coating materials and cleanup materials employed, in tons per month (the sum of (c) times (d) for each coating material plus the sum of (g) times (h) for each cleanup material, minus the sum of (j) times (k) for each recycled and waste cleanup material, divided by 2000 lbs/ton).

n. During the first 12 calendar months of operation following the issuance of this permit, the cumulative individual HAP emissions for each calendar month, in tons.

o. Beginning after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons.

p. During the first 12 calendar months of operation following the issuance of this permit, the cumulative combined HAPs emissions for each calendar month, in tons.

q. Beginning after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined HAPs emissions from all coating materials and cleanup materials employed, in tons.

*A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line by line basis.

D. 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 the coating line employed more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports which specify the individual HAP emissions from the facility, the combined HAPs emissions from the facility, and the total VOC emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports, in accordance with General Term and Condition 3.b, that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in Section B.1. of these terms and conditions.
4. The permittee shall submit deviation (excursion) reports, in accordance with General Term and Condition 3.b, that identify all exceedances of the rolling, 12-month emission limitation for combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in Section B.1. of these terms and conditions.

E. Testing Requirements

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

- a. Emission Limitation-
8 gals/day of coatings

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section C.1

- b. Emission Limitation-
52.7 lbs/day VOC

Applicable Compliance Method-
Compliance shall be determined by multiplying the maximum coating usage per day (8 gal/day) by the maximum VOC content of the coatings (5.15 lbs VOC/gal).

- c. Emission Limitation-
6.50 TPY VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in Sections C.2. and C.3. and shall be the sum of the twelve monthly VOC emission rates for the calendar year.

- d. Emission Limitation-
8.88 TPY cleanup material emissions for emissions units K005, K007, K008, K009, K010, R002, and R005, combined

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

- e. Emission Limitation-
9.9 TPY individual HAP emissions, facility-wide, based upon rolling 12-month summations

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section C.4. for each individual HAP with the addition of total chromium emissions from emissions unit P021.

- f. Emission Limitation-
24.9 TPY combined HAP emissions, facility-wide, based upon rolling 12-month summations

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section C.4. for combined HAPs with the addition of total chromium emissions from emissions unit P021.

2. Formulation data shall be used to determine the VOC and HAP contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. The terms and conditions in sections A, B, C, D, E, and F of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.



State of Ohio Environmental Protection Agency

Street Address:

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

Mailing Address:

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

06/14/04

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

K009 (F69-66R) Spray booth [adhesive]

Moyno Industrial Products (08-12-10-0350)
Scott F. Wilson
1895 W. Jefferson Street
Springfield, OH 45506

Dear Scott F. Wilson:

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

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact RAPCA.

Sincerely,

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

cc: RAPCA



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 06/14/04

Expiration Date 06/14/09

This document constitutes issuance to

Facility ID: 08-12-10-0350
Moyno Industrial Products
1895 W. Jefferson St.
Springfield, OH 45506

of a permit to operate for:

K009 (F69-66R)
Spray booth [adhesive]

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

RAPCA
117 South Main Street
Dayton, OH 45422-1280
(937) 225-4435

This permit is granted subject to the conditions attached hereto

OHIO ENVIRONMENTAL PROTECTION AGENCY

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

Christopher Jones
Director

Part I: General Terms and Conditions

1 Compliance Requirements

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

2. Permit to Install Requirement

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

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner

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

4 Records Retention Requirements

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

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of

a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

RAPCA
117 South Main Street
Dayton, OH 45422-1280
(937) 225-4435

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K009 - F-69 stator tube paint booth misc. metal parts	OAC rule 3745-31-05(A)(3) PTI# 08-2492	Volatile organic compound (VOC) emissions shall not exceed 52.7 lbs/day, excluding cleanup.
		VOC emissions shall not exceed 6.50 TPY, excluding cleanup.
		See A.2.a for the combined cleanup material VOC emissions limitation.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(i).
	OAC rule 3745-35-07	See B.1.
	OAC rule 3745-21-09(U)(2)(e)(i)	The maximum daily coating usage shall not exceed 8 gallons of coatings in any one day.

2. Additional Terms and Conditions

- 2.a The combined VOC emissions from cleanup material for emissions units K005, K007, K008, K009, K010 R002, and R005 shall not exceed 8.88 TPY.
- 2.b The 52.7 lbs /day VOC limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any individual HAP and 24.9 TPY for the combination of all HAPs, based upon rolling, 12-month summations.

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

Month(s)	Maximum Allowable Cumulative Emissions of Individual HAPs (Tons)	Maximum Allowable Cumulative Emissions of Combined HAPs (Tons)
1	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23
1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60
1-9	7.43	18.68
1-10	8.25	20.75
1-11	9.08	22.83
1-12	9.90	24.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for any individual HAP and combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating employed
 - b. The volume, in gallons, of each coating employed
 - c. The total volume, in gallons, of all of the coatings employed.
2. The permittee shall collect and record the following information each month for emissions units K005, K007, K008, K009, K010, R002, and R005 for the purpose of determining annual VOC emissions from cleanup materials usage:
 - a. The name and identification of each cleanup material employed
 - b. The number of gallons of each cleanup material employed
 - c. The VOC content of each cleanup material, in pounds per gallon
 - d. The number of gallons of each cleanup material disposed of as waste or recycled
 - e. The VOC content of each cleanup material disposed of as waste or recycled, in pounds per gallon
 - f. The total VOC emissions from all cleanup materials employed, in tons (for all cleanup materials, the sum of (b) times (c) minus the sum of (d) times (e), divided by 2000 lbs/ton).

C. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each month for this emissions unit for the purpose of determining annual VOC emissions:
 - a. The name and identification of each coating employed.
 - b. The number of gallons of each coating employed
 - c. The VOC content of each coating, as applied, in pounds per gallon and in pounds per gallon excluding water and exempt solvents.
 - d. The total VOC emissions from all coatings and cleanup materials employed, in tons (for all coatings, the sum of (b) times (c), plus for all cleanup materials, the sum of (C.2.b) times (C.2.c) minus the sum of (C.2.d) times (C.2.e), divided by 2000 lbs/ton).
4. The permittee shall collect and record the following information each month for the entire facility:
 - a. The name and identification number of each coating material employed.
 - b. The individual hazardous air pollutant (HAP)* content for each HAP of each coating material, in pounds of individual HAP per gallon , as applied.
 - c. The total combined HAPs content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from (b)).
 - d. The number of gallons of each coating material employed
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from (f)).
 - h. The number of gallons of each cleanup material employed.
 - i. The individual HAP content for each HAP of each recycled and waste cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - j. The total combined HAPs content of each recycled and waste cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from (f)).
 - k. The number of gallons of each recycled and waste cleanup material employed
 - l. The total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons per month (for each HAP, the sum of (b) times (d) for each coating material plus the sum of (f) times (h) for each cleanup material, minus the sum of (i) times (k) for each recycled and waste cleanup material, divided by 2000 lbs/ton).

C. Monitoring and/or Record Keeping Requirements (continued)

m. The total combined HAPs emissions from all coating materials and cleanup materials employed, in tons per month (the sum of (c) times (d) for each coating material plus the sum of (g) times (h) for each cleanup material, minus the sum of (j) times (k) for each recycled and waste cleanup material, divided by 2000 lbs/ton)

n. During the first 12 calendar months of operation following the issuance of this permit, the cumulative individual HAP emissions for each calendar month, in tons.

o. Beginning after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons.

p. During the first 12 calendar months of operation following the issuance of this permit, the cumulative combined HAPs emissions for each calendar month, in tons.

q. Beginning after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined HAPs emissions from all coating materials and cleanup materials employed, in tons.

*A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line by line basis.

D. 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 the coating line employed more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports which specify the individual HAP emissions from the facility, the combined HAPs emissions from the facility, and the total VOC emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports, in accordance with General Term and Condition 3.b, that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in Section B.1. of these terms and conditions.
4. The permittee shall submit deviation (excursion) reports, in accordance with General Term and Condition 3.b, that identify all exceedances of the rolling, 12-month emission limitation for combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in Section B.1. of these terms and conditions.

E. Testing Requirements

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

- a. Emission Limitation-
8 gals/day of coatings

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section C.1

- b. Emission Limitation-
52.7 lbs/day VOC

Applicable Compliance Method-
Compliance shall be determined by multiplying the maximum coating usage per day (8 gal/day) by the maximum VOC content of the coatings (5.15 lbs VOC/gal).

- c. Emission Limitation-
6.50 TPY VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in Sections C.2. and C.3. and shall be the sum of the twelve monthly VOC emission rates for the calendar year.

- d. Emission Limitation-
8.88 TPY cleanup material emissions for emissions units K005, K007, K008, K009, K010, R002, and R005, combined

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

- e. Emission Limitation-
9.9 TPY individual HAP emissions, facility-wide, based upon rolling 12-month summations

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section C.4. for each individual HAP with the addition of total chromium emissions from emissions unit P021.

- f. Emission Limitation-
24.9 TPY combined HAP emissions, facility-wide, based upon rolling 12-month summations

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section C.4. for combined HAPs with the addition of total chromium emissions from emissions unit P021.

2. Formulation data shall be used to determine the VOC and HAP contents of the coatings and cleanup materials.

F Miscellaneous Requirements

1. The terms and conditions in sections A, B, C, D, E, and F of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

06/14/04

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

K010 (F74-66Z) Paint Spray Booth

Moyno Industrial Products (08-12-10-0350)
Scott F. Wilson
1895 W. Jefferson Street
Springfield, OH 45506

Dear Scott F. Wilson:

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

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact RAPCA.

Sincerely,

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

cc: RAPCA



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 06/14/04

Expiration Date: 06/14/09

This document constitutes issuance to:

Facility ID: 08-12-10-0350
Moyno Industrial Products
1895 W. Jefferson St.
Springfield, OH 45506

of a permit to operate for:

K010 (F74-66Z)
Paint Spray Booth

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

RAPCA
117 South Main Street
Dayton, OH 45422-1280
(937) 225-4435

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

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

2. Permit to Install Requirement

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

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

4. Records Retention Requirements

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

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of

a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

RAPCA
117 South Main Street
Dayton, OH 45422-1280
(937) 225-4435

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K010 - F-74 paint booth; misc. metal parts	OAC rule 3745-31-05(A)(3) PTI# 08-3746	Volatile organic compound (VOC) emissions shall not exceed 41.2 lbs/day, excluding cleanup.
		VOC emissions shall not exceed 6.29 TPY, excluding cleanup.
		See A.2.a for the combined cleanup material VOC emissions limitation.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(i).
	OAC rule 3745-35-07	See B.1.
	OAC rule 3745-21-09(U)(2)(e)(i)	The maximum daily coating usage shall not exceed 8 gallons of coatings in any one day.

2. Additional Terms and Conditions

- 2.a The combined VOC emissions from cleanup material for emissions units K005, K007, K008, K009, K010, R002, and R005 shall not exceed 8.88 TPY.
- 2.b The 41.2 lbs /day VOC limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any individual HAP and 24.9 TPY for the combination of all HAPs, based upon rolling, 12-month summations.

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

Month(s)	Maximum Allowable Cumulative Emissions of Individual HAPs (Tons)	Maximum Allowable Cumulative Emissions of Combined HAPs (Tons)
1	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23
1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60
1-9	7.43	18.68
1-10	8.25	20.75
1-11	9.08	22.83
1-12	9.90	24.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for any individual HAP and combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating employed
 - b. The volume, in gallons, of each coating employed
 - c. The total volume, in gallons, of all of the coatings employed.
2. The permittee shall collect and record the following information each month for emissions units K005, K007, K008, K009, K010, R002, and R005 for the purpose of determining annual VOC emissions from cleanup materials usage:
 - a. The name and identification of each cleanup material employed
 - b. The number of gallons of each cleanup material employed
 - c. The VOC content of each cleanup material, in pounds per gallon.
 - d. The number of gallons of each cleanup material disposed of as waste or recycled.
 - e. The VOC content of each cleanup material disposed of as waste or recycled, in pounds per gallon.
 - f. The total VOC emissions from all cleanup materials employed, in tons (for all cleanup materials, the sum of (b) times (c) minus the sum of (d) times (e), divided by 2000 lbs/ton).

C. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each month for this emissions unit for the purpose of determining annual VOC emissions:
 - a. The name and identification of each coating employed
 - b. The number of gallons of each coating employed.
 - c. The VOC content of each coating, as applied, in pounds per gallon and in pounds per gallon excluding water and exempt solvents.
 - d. The total VOC emissions from all coatings and cleanup materials employed, in tons (for all coatings, the sum of (b) times (c), plus for all cleanup materials, the sum of (C.2.b) times (C.2.c) minus the sum of (C.2.d) times (C.2.e), divided by 2000 lbs/ton).
4. The permittee shall collect and record the following information each month for the entire facility:
 - a. The name and identification number of each coating material employed
 - b. The individual hazardous air pollutant (HAP)* content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.
 - c. The total combined HAPs content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from (b)).
 - d. The number of gallons of each coating material employed
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from (f)).
 - h. The number of gallons of each cleanup material employed
 - i. The individual HAP content for each HAP of each recycled and waste cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - j. The total combined HAPs content of each recycled and waste cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from (f)).
 - k. The number of gallons of each recycled and waste cleanup material employed
 - l. The total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons per month (for each HAP, the sum of (b) times (d) for each coating material plus the sum of (f) times (h) for each cleanup material, minus the sum of (i) times (k) for each recycled and waste cleanup material, divided by 2000 lbs/ton).

C. Monitoring and/or Record Keeping Requirements (continued)

m. The total combined HAPs emissions from all coating materials and cleanup materials employed, in tons per month (the sum of (c) times (d) for each coating material plus the sum of (g) times (h) for each cleanup material, minus the sum of (j) times (k) for each recycled and waste cleanup material, divided by 2000 lbs/ton)

n. During the first 12 calendar months of operation following the issuance of this permit, the cumulative individual HAP emissions for each calendar month, in tons.

o. Beginning after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons.

p. During the first 12 calendar months of operation following the issuance of this permit, the cumulative combined HAPs emissions for each calendar month, in tons.

q. Beginning after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined HAPs emissions from all coating materials and cleanup materials employed, in tons.

*A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line by line basis.

D. 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 the coating line employed more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports which specify the individual HAP emissions from the facility, the combined HAPs emissions from the facility, and the total VOC emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports, in accordance with General Term and Condition 3.b, that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in Section B.1. of these terms and conditions.
4. The permittee shall submit deviation (excursion) reports, in accordance with General Term and Condition 3.b, that identify all exceedances of the rolling, 12-month emission limitation for combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in Section B.1. of these terms and conditions.

E. Testing Requirements

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

a. Emission Limitation-
8 gals/day of coatings

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section C.1

b. Emission Limitation-
41.2 lbs/day VOC

Applicable Compliance Method-
Compliance shall be determined by multiplying the maximum coating usage per day (8 gal/day) by the maximum VOC content of the coatings (5.15 lbs VOC/gal).

c. Emission Limitation-
6.29 TPY VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in Sections C.2. and C.3. and shall be the sum of the twelve monthly VOC emission rates for the calendar year.

d. Emission Limitation-
8.88 TPY cleanup material emissions for emissions units K005, K007, K008, K009, K010, R002, and R005, combined

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

e. Emission Limitation-
9.9 TPY individual HAP emissions, facility-wide, based upon rolling 12-month summations

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section C.4. for each individual HAP with the addition of total chromium emissions from emissions unit P021.

f. Emission Limitation-
24.9 TPY combined HAP emissions, facility-wide, based upon rolling 12-month summations

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section C.4. for combined HAPs with the addition of total chromium emissions from emissions unit P021.

2. Formulation data shall be used to determine the VOC and HAP contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. The terms and conditions in sections A, B, C, D, E, and F of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.



State of Ohio Environmental Protection Agency

Street Address:

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

Mailing Address:

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

06/14/04

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

R002 (F10-66A) Touch-up paint spray booth

Moyno Industrial Products (08-12-10-0350)
Scott F. Wilson
1895 W. Jefferson Street
Springfield, OH 45506

Dear Scott F. Wilson

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

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact RAPCA.

Sincerely,

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

cc: RAPCA



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 06/14/04

Expiration Date 06/14/09

This document constitutes issuance to:

Facility ID: 08-12-10-0350
Moyno Industrial Products
1895 W. Jefferson St.
Springfield, OH 45506

of a permit to operate for:

R002 (F10-66A)
Touch-up paint spray booth

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

RAPCA
117 South Main Street
Dayton, OH 45422-1280
(937) 225-4435

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

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

2. Permit to Install Requirement

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

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

4. Records Retention Requirements

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

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of

a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

RAPCA
117 South Main Street
Dayton, OH 45422-1280
(937) 225-4435

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R002 - touch-up paint booth; misc. metal parts	OAC rule 3745-21-09(U)(2)(e)(i)	The maximum daily coating usage shall not exceed 8 gallons of coatings in any one day.
	OAC rule 3745-35-07	See A.2.a for the combined cleanup material VOC emissions limitation. See B.1.

2. Additional Terms and Conditions

- 2.a The combined VOC emissions from cleanup material for emissions units K005, K007, K008, K009, K010, R002, and R005 shall not exceed 8.88 TPY.

B. Operational Restrictions

1. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any individual HAP and 24.9 TPY for the combination of all HAPs, based upon rolling, 12-month summations.

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

Month(s)	Maximum Allowable Cumulative Emissions of Individual HAPs (Tons)	Maximum Allowable Cumulative Emissions of Combined HAPs (Tons)
1	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23
1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60
1-9	7.43	18.68
1-10	8.25	20.75
1-11	9.08	22.83
1-12	9.90	24.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for any individual HAP and combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

C Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating employed
 - b. The volume, in gallons, of each coating employed
 - c. The total volume, in gallons, of all of the coatings employed.
2. The permittee shall collect and record the following information each month for emissions units K005, K007, K008, K009, K010, R002, and R005 for the purpose of determining annual VOC emissions from cleanup materials usage:
 - a. The name and identification of each cleanup material employed
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content of each cleanup material, in pounds per gallon
 - d. The number of gallons of each cleanup material disposed of as waste or recycled.
 - e. The VOC content of each cleanup material disposed of as waste or recycled, in pounds per gallon
 - f. The total VOC emissions from all cleanup materials employed, in tons (for all cleanup materials, the sum of (b) times (c) minus the sum of (d) times (e), divided by 2000 lbs/ton).
3. The permittee shall collect and record the following information each month for the entire facility:
 - a. The name and identification number of each coating material employed
 - b. The individual hazardous air pollutant (HAP)* content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.
 - c. The total combined HAPs content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from (b)).
 - d. The number of gallons of each coating material employed
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from (f)).
 - h. The number of gallons of each cleanup material employed.
 - i. The individual HAP content for each HAP of each recycled and waste cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - j. The total combined HAPs content of each recycled and waste cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from (f)).
 - k. The number of gallons of each recycled and waste cleanup material employed
 - l. The total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons per month (for each HAP, the sum of (b) times (d) for each coating material plus the sum of (f) times (h) for each cleanup material, minus the sum of (i) times (k) for each recycled and waste cleanup material, divided by 2000 lbs/ton).

C Monitoring and/or Record Keeping Requirements (continued)

m. The total combined HAPs emissions from all coating materials and cleanup materials employed, in tons per month (the sum of (c) times (d) for each coating material plus the sum of (g) times (h) for each cleanup material, minus the sum of (j) times (k) for each recycled and waste cleanup material, divided by 2000 lbs/ton)

n. During the first 12 calendar months of operation following the issuance of this permit, the cumulative individual HAP emissions for each calendar month, in tons.

o. Beginning after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons.

p. During the first 12 calendar months of operation following the issuance of this permit, the cumulative combined HAPs emissions for each calendar month, in tons.

q. Beginning after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined HAPs emissions from all coating materials and cleanup materials employed, in tons.

*A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line by line basis.

D. 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 the coating line employed more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports which specify the individual HAP emissions from the facility, the combined HAPs emissions from the facility, and the total VOC emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports, in accordance with General Term and Condition 3.b, that identify all exceedances of the rolling, 12-month emission limitation for individual HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in Section B.1. of these terms and conditions.
4. The permittee shall submit deviation (excursion) reports, in accordance with General Term and Condition 3.b, that identify all exceedances of the rolling, 12-month emission limitation for combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in Section B.1. of these terms and conditions.

E. Testing Requirements

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

- a. Emission Limitation-
8 gals/day of coatings

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section C.1

- b. Emission Limitation-
8.88 TPY cleanup material usage for emissions units K005, K007, K008, K009, K010, R002, and R005, combined

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

- c. Emission Limitation-
9.9 TPY individual HAP emissions, facility-wide, based upon rolling 12-month summations

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section C.3. for each individual HAP with the addition of total chromium emissions from emissions unit P021.

- d. Emission Limitation-
24.9 TPY combined HAP emissions, facility-wide, based upon rolling 12-month summations

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section C.3. for combined HAPs with the addition of total chromium emissions from emissions unit P021.

2. Formulation data shall be used to determine the VOC and HAP contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. The terms and conditions in sections A, B, C, D, E, and F of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

06/14/04

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

R005 (F14-66M) Paint spray booth

Moyno Industrial Products (08-12-10-0350)
Scott F. Wilson
1895 W. Jefferson Street
Springfield, OH 45506

Dear Scott Wilson

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

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact RAPCA.

Sincerely,

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

cc: RAPCA



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date 06/14/04

Expiration Date: 06/14/09

This document constitutes issuance to:

Facility ID: 08-12-10-0350
Moyno Industrial Products
1895 W. Jefferson St.
Springfield, OH 45506

of a permit to operate for:

R005 (F14-66M)
Paint spray booth

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

RAPCA
117 South Main Street
Dayton, OH 45422-1280
(937) 225-4435

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

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

2. Permit to Install Requirement

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

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner

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

4. Records Retention Requirements

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

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of

a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

RAPCA
117 South Main Street
Dayton, OH 45422-1280
(937) 225-4435

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R005 - castings and stator tubes paint booth; misc. metal parts	OAC rule 3745-21-09(U)(2)(e)(i)	The maximum daily coating usage shall not exceed 8 gallons of coatings in any one day.
	OAC rule 3745-35-07	See A.2.a for the combined cleanup material VOC emissions limitation. See B.1.

2. **Additional Terms and Conditions**

- 2.a The combined VOC emissions from cleanup material for emissions units K005, K007, K008, K009, K010, R002, and R005 shall not exceed 8.88 TPY.

B. Operational Restrictions

1. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any individual HAP and 24.9 TPY for the combination of all HAPs, based upon rolling, 12-month summations.

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

Month(s)	Maximum Allowable Cumulative Emissions of Individual HAPs (Tons)	Maximum Allowable Cumulative Emissions of Combined HAPs (Tons)
1	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23
1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60
1-9	7.43	18.68
1-10	8.25	20.75
1-11	9.08	22.83
1-12	9.90	24.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for any individual HAP and combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all of the coatings employed.
2. The permittee shall collect and record the following information each month for emissions units K005, K007, K008, K009, K010, R002, and R005 for the purpose of determining annual VOC emissions from cleanup materials usage:
 - a. The name and identification of each cleanup material employed
 - b. The number of gallons of each cleanup material employed
 - c. The VOC content of each cleanup material, in pounds per gallon
 - d. The number of gallons of each cleanup material disposed of as waste or recycled
 - e. The VOC content of each cleanup material disposed of as waste or recycled, in pounds per gallon
 - f. The total VOC emissions from all cleanup materials employed, in tons (for all cleanup materials, the sum of (b) times (c) minus the sum of (d) times (e), divided by 2000 lbs/ton).
3. The permittee shall collect and record the following information each month for the entire facility:
 - a. The name and identification number of each coating material employed
 - b. The individual hazardous air pollutant (HAP)* content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.
 - c. The total combined HAPs content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from (b)).
 - d. The number of gallons of each coating material employed
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from (f)).
 - h. The number of gallons of each cleanup material employed
 - i. The individual HAP content for each HAP of each recycled and waste cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - j. The total combined HAPs content of each recycled and waste cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from (f)).
 - k. The number of gallons of each recycled and waste cleanup material employed
 - l. The total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons per month (for each HAP, the sum of (b) times (d) for each coating material plus the sum of (f) times (h) for each cleanup material, minus the sum of (i) times (k) for each recycled and waste cleanup material, divided by 2000 lbs/ton).

C. Monitoring and/or Record Keeping Requirements (continued)

m. The total combined HAPs emissions from all coating materials and cleanup materials employed, in tons per month (the sum of (c) times (d) for each coating material plus the sum of (g) times (h) for each cleanup material, minus the sum of (j) times (k) for each recycled and waste cleanup material, divided by 2000 lbs/ton)

n. During the first 12 calendar months of operation following the issuance of this permit, the cumulative individual HAP emissions for each calendar month, in tons.

o. Beginning after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons.

p. During the first 12 calendar months of operation following the issuance of this permit, the cumulative combined HAPs emissions for each calendar month, in tons.

q. Beginning after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined HAPs emissions from all coating materials and cleanup materials employed, in tons.

*A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line by line basis.

D. 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 the coating line employed more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports which specify the individual HAP emissions from the facility, the combined HAPs emissions from the facility, and the total VOC emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports, in accordance with General Term and Condition 3.b, that identify all exceedances of the rolling, 12-month emission limitation for individual HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in Section B.1. of these terms and conditions.
4. The permittee shall submit deviation (excursion) reports, in accordance with General Term and Condition 3.b, that identify all exceedances of the rolling, 12-month emission limitation for combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in Section B.1. of these terms and conditions.

E. Testing Requirements

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

- a. Emission Limitation-
8 gals/day of coatings

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section C.1

- b. Emission Limitation-
8.88 TPY cleanup material usage for emissions units K005, K007, K008, K009, K010, R002, and R005, combined

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

- c. Emission Limitation-
9.9 TPY individual HAP emissions, facility-wide, based upon rolling 12-month summations

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section C.3. for each individual HAP with the addition of total chromium emissions from emissions unit P021.

- d. Emission Limitation-
24.9 TPY combined HAP emissions, facility-wide, based upon rolling 12-month summations

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section C.3. for combined HAPs with the addition of total chromium emissions from emissions unit P021.

2. Formulation data shall be used to determine the VOC and HAP contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. The terms and conditions in sections A, B, C, D, E, and F of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.