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

12/23/2013

Certified Mail

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

Brian Laycock
ABX Air
145 Hunter Drive
CP-2
Wilmington, OH 45177

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0514010124
Permit Number: P0115775
Permit Type: Initial Installation
County: Clinton

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Ohio EPA DAPC, Southwest District Office at (937)285-6357or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-SWDO

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
ABX Air

Facility ID:	0514010124
Permit Number:	P0115775
Permit Type:	Initial Installation
Issued:	12/23/2013
Effective:	12/23/2013
Expiration:	11/3/2014

Division of Air Pollution Control
Permit-to-Install and Operate
for
ABX Air

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Authorization

Facility ID:	0514010124
Application Number(s):	A0049265
Permit Number:	P0115775
Permit Description:	Installation permit for hangar paint booths used to paint aircraft parts.
Permit Type:	Initial Installation
Permit Fee:	$400.00
Issue Date:	12/23/2013
Effective Date:	12/23/2013
Expiration Date:	11/3/2014

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

This document constitutes issuance to:

ABX Air
145 HUNTER DR
WILMINGTON, OH 45177

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

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

Ohio EPA DAPC, Southwest District Office
401 East Fifth Street
Dayton, OH 45402
(937)285-6357

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0115775
Permit Description: Installation permit for hangar paint booths used to paint aircraft parts.

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

Emissions Unit ID:	**K014**
Company Equipment ID:	K1006
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K015**
Company Equipment ID:	K1006B
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10.0 tons per year (TPY) for any individual HAP and 25.0 TPY for the combination of all HAPs, based upon rolling, 12-month summations.

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

   a) the company identification for each HAP-emitting material (i.e., all HAP-containing coatings, clean-up materials, resins, adhesives, potting compounds, plating chemicals, etc.);

   b) the individual HAP content of each HAP emitting material;

   c) the total combined HAP content of each HAP emitting material (i.e. sum of individual HAP contents from b);

   d) the amount of each HAP emitting material employed during the previous calendar month;

   e) the hours of operation, or other emissions determining rationale, of all HAP-generating sources (e.g., fuel combustion, sanding/grinding operations, plating);

   f) the total individual HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in pounds or tons per month;

   g) the total combined HAP emissions from all HAP emitting materials employed and all HAP-generating sources, in pounds or tons per month;

   h) the rolling, 12-month summation of individual HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in tons; and

   i) the rolling, 12-month summation of total combined HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in tons.

4. The permittee shall submit quarterly deviation (excursion) reports for the following emissions unit(s) that identify:

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

      (1) The rolling 12 individual HAP emissions is greater than 9.0 tons from this facility; and

      (2) The rolling 12 month combined HAP's emissions are greater than 22.5 tons from this facility.

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

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

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

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

C. Emissions Unit Terms and Conditions

1. K014, K1006, Roll and Brush Coating Operation

Operations, Property and/or Equipment Description:

Main Hangar 1006. Used to painted parts attached to the aircraft in for maintenance.

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

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

a. b)(1)f. and d)(3), below.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC 3745-31-05(A)(3), as effective 11/30/01	Same as the requirements under OAC rule 3745-31-05(D)
b.	OAC rule 3745-31-05(A)(3)(ii), as effective 12/01/06	See section b)(2)b., below
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V requirements and the applicability of 40 CR Part 63 Subpart GG)	See section B.2, 3, and 4, above for facility-wide HAP(s) limitations, above. Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 9.34 ton rolling 12 month limit. The combined VOC emissions from the use of liquid organic cleanup materials employed in emissions units K001, K004, K005, K006, K007, K010, K011, K012, K013, K014, and K015 shall not exceed 9.4 tons per rolling 12-month period.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(C)	Exempt See section b)(2)c, below.
e.	OAC rule 3745-21-09(U)(2)b.	See section b)(2)d, below.
f.	OAC rule 3745-114-01	Ohio Air Toxic Rule.

(2) Additional Terms and Conditions

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

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions this emissions unit since the potential to emit of each pollutant is less than ten tons per year.

c. Under OAC rule 3745-17-11(A)(h) exempts surface coating processes that apply only dip coatings, roll coatings, flow coatings, or brush coatings are exempt from the requirements under OAC rule 3745-17-11(C).

d. OAC rule 3745-21-09(U)(2)(b) exempts the application of an exterior coating to airplanes from the coating requirements of OAC rule 3745-21-09(U).

c) Operational Restrictions

(1) The combined liquid organic cleanup material employed in emissions units K001, K004, K005, K006, K007, K010, K011, K012, K013, K014, and K015 shall not exceed the following;

a. The rolling 12-month liquid organic cleanup material usage of 2,500 gallons; and

b. The maximum liquid organic cleanup material volatile organic compound (VOC) content of 7.5 pounds per gallon.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records:

a. The amount of each material employed, in gallons;

b. The density of each maintain employed, in pounds per gallon;

c. The volatile organic compound (VOC/OC) content of each maintain employed, in percent by weight VOC/OC;

d. The combined amount of VOC/OC employed, in tons;

e. Amount of VOC/OC emitted in tons; and

f. The rolling 12 month VOC/OC emissions from this emissions unit, calculated using the summation of "e" plus the previous 11 months, in tons per rolling 12 month period.

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

Month(s)	Maximum Allowable Cumulative VOC emissions, in tons
1	1.0
1-2	2.0
1-3	3.0
1-4	4.0
1-5	5.0
1-6	6.0
1-7	7.0
1-8	8.0
1-9	8.5
1-10	9.34
1-11	9.34
1-12	9.34

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the rolling 12 month VOC /OC +emission shall be based upon section b) of this permit.

(2) The permittee shall collect and record the following information for each month for the cleanup materials employed in emissions units K001, K004, K005, K006, K007, K010, K011, K012, K013, K014, and K015:

a. the company identification for each coating and clean-up material employed;

b. the number of gallons of each clean-up material employed. The clean-up material employed may be based on purchasing records or actual usage tracking;

c. the VOC/OC content of clean-up material, in pounds per gallon;

d. the total combined VOC generated clean-up materials employed, in tons per month;

e. the amount of clean-up material recovered, in gallons;

f. the VOC content of recovered clean-up material, in percent by volume;

g. the estimated amount of clean-up material recovered, in gallons, (the summation of: ("e" x "f");

h. the total amount of VOC/OC material recovered, in tons per month, (the summation of: [("g" x 7.5 pounds of gallon*)/ 2000));

i. the total combined monthly VOC/OC emissions, in tons per month, (the summation of: ("d" - "h"); and

j. the total combined rolling, 12-month summation VOC/OC emissions, in tons. The rolling, 12 month summation of the total VOC/OC emissions (the total amount of VOC/OC emissions for the current month ("i") plus the total amount of VOC/OC emissions for the 11 previous calendar months).

* This assumed VOC content of 7.5 pounds per gallon is lower than VOC content of the clean-up solvents that will be employed at this facility and will be used to represent the worst case emissions as based on the facility's application. VOC/OC emission rates calculated based on purchasing records are assumed to represent the worst case actual emissions and may be used to demonstrate compliance with the above list VOC/OC emission limitations, in section b.

(3) Modeling to demonstrate compliance with, the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

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

i. Volatile organic compound (VOC) emissions from this emissions unit exceeds 9.34 ton rolling 12 month limit; and

ii. The rolling 12-month volatile organic compound (VOC) emissions from the combined the use of liquid organic cleanup materials employed in emissions units K001, K004, K005, K006, K007, K010, K011, K012, K013, K014, and K015 is greater than 9.4 tons.

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

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

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

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

Any exceedance of the daily limitation on toxic air emissions as established by the Director in order to maintain any toxic air contaminant below its MAGLC; and

Any changes made, during the calendar quarter, to a parameter or value entered into the dispersion model that demonstrates compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

The permittee shall submit quarterly deviation reports, to the appropriate Ohio EPA District Office or local air agency, documenting any exceedance of the daily limitation on toxic air emissions or any deviation from a restriction on the process or hours of operation, as established by the Director in order to maintain any toxic air contaminant below its MAGLC. The permittee shall also report any changes made, during the calendar quarter, to a parameter or value entered into the dispersion model that demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F). These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following:

a. Emission Limitation -

9.34 tons of VOC per rolling 12 month period.

Applicable Compliance Method -

Compliance shall be demonstrated through the record keeping requirements specified in section d), as established in this permit.

b. Emissions Limitation:

9.4 TPY of combined VOC emissions from liquid organic cleanup materials employed in emissions units K001, K004, K005, K006, K007, K010, K011, K012, K013, K014, and K015.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements specified in section d), as established in this permit.

g) Miscellaneous Requirements

(1) None.

2. K015, K1006B

Operations, Property and/or Equipment Description:

Paint Booth in 1006 Hangar

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

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

a. b)(1)c. and d)(3), below.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC 3745-31-05(A)(3), as effective 11/30/01	Compliance with the emission limitations under OAC rule 3745-31-05(D)
b.	OAC rule 3745-31-05(A)(3)(ii), as effective 12/01/06	See section b)(2)b., below
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V requirements and the applicability of 40 CR Part 63 Subpart GG)	See section B.2, 3, and 4, above for facility-wide HAP(s) limitations, above. Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 9.9 ton rolling 12 month limit. The combined VOC emissions from the use of liquid organic cleanup materials employed in emissions units K001, K004, K005, K006, K007, K010, K011, K012, K013, K014, and K015 shall not exceed 9.4 tons per rolling 12-month period.

d.	OAC rule 3745-17-11(C)	The use of a dry filter system.
e.	OAC rule 3745-21-09(U)(2)(b)	See section b)(2)e., below
f.	OAC rule 3745-114-01	Ohio Air Toxic Rule.

(2) Additional Terms and Conditions

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

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions and particulate emissions from this emissions unit since the potential to emit of each pollutant are less than ten tons per year.

c. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

[OAC rule 3745-17-11(C)]

d. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

[OAC rule 3745-17-11(C)(1)]

e. OAC rule 3745-21-09(U)(2)(b) exempts the application of an exterior coating to airplanes from the coating requirements of OAC rule 3745-21-09(U).

c) Operational Restrictions

(1) The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

[OAC rule 3745-17-11(C)(2)(b)]

(2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-17-11(C)(2)(e)].

(3) The combined liquid organic cleanup material employed in emissions units K001, K004, K005, K006, K007, K010, K011, K012, K013, K014, and K015 shall not exceed the following;

a. The rolling 12-month liquid organic cleanup material usage of 2,500 gallons; and

b. The maximum liquid organic cleanup material volatile organic compound (VOC) content of 7.5 pounds per gallon.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records:

a. The amount of each material employed, in gallons;

b. The density of each maintain employed, in pounds per gallon;

c. The volatile organic compound (VOC/OC) content of each maintain employed, in percent by weight VOC/OC;

d. The combined amount of VOC/OC employed, in tons;

e. Amount of VOC/OC emitted in tons; and

f. The rolling 12 month VOC/OC emissions from this emissions unit, calculated using the summation of "e" plus the previous 11 months, in tons per rolling 12 month period.

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

Month(s)	Maximum Allowable Cumulative VOC emissions, in tons
1	1.0
1-2	2.0
1-3	3.0
1-4	4.0
1-5	5.0
1-6	6.0
1-7	7.0
1-8	8.0
1-9	9.0
1-10	9.9
1-11	9.9
1-12	9.9

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the rolling 12 month VOC /OC +emission shall be based upon section b) of this permit.

(2) The permittee shall collect and record the following information for each month for the cleanup materials employed in emissions units K001, K004, K005, K006, K007, K010, K011, K012, K013, K014, and K015:

a. the company identification for each coating and clean-up material employed;

b. the number of gallons of each clean-up material employed. The clean-up material employed may be based on purchasing records or actual usage tracking;

c. the VOC/OC content of clean-up material, in pounds per gallon;

d. the total combined VOC generated clean-up materials employed, in tons per month;

e. the amount of clean-up material recovered, in gallons;

f. the VOC content of recovered clean-up material, in percent by volume;

g. the estimated amount of clean-up material recovered, in gallons, (the summation of: ("e" x "f");

h. the total amount of VOC/OC material recovered, in tons per month, (the summation of: [("g" x 7.5 pounds of gallon*)/ 2000));

i. the total combined monthly VOC/OC emissions, in tons per month, (the summation of: ("d" - "h"); and

j. the total combined rolling, 12-month summation VOC/OC emissions, in tons. The rolling, 12 month summation of the total VOC/OC emissions (the total amount of VOC/OC emissions for the current month ("i") plus the total amount of VOC/OC emissions for the 11 previous calendar months).

* This assumed VOC content of 7.5 pounds per gallon is lower than VOC content of the clean-up solvents that will be employed at this facility and will be used to represent the worst case emissions as based on the facility's application. VOC/OC emission rates calculated based on purchasing records are assumed to represent the worst case actual emissions and may be used to demonstrate compliance with the above list VOC/OC emission limitations, in section b.

(3) Modeling to demonstrate compliance with, the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

(4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a)]

(5) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C)(2)(c)]

(6) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c)]

(7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-17-11(C)(2)(d) and (f)]

(8) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C)(2)(f) and (g)].

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

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

i. Any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

ii. Volatile organic compound (VOC) emissions from this emissions unit exceeds 9.9 ton rolling 12 month limit; and

iii. The rolling 12-month volatile organic compound (VOC) emissions from the combined the use of liquid organic cleanup materials employed in emissions units K001, K004, K005, K006, K007, K010, K011, K012, K013, K014, and K015 is greater than 9.4 tons.

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

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

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

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

[OAC rule 3745-15-03(B)(1)(b) and OAC rule 3745-15-03(C)]

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

Any exceedance of the daily limitation on toxic air emissions as established by the Director in order to maintain any toxic air contaminant below its MAGLC; and

Any changes made, during the calendar quarter, to a parameter or value entered into the dispersion model that demonstrates compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

The permittee shall submit quarterly deviation reports, to the appropriate Ohio EPA District Office or local air agency, documenting any exceedance of the daily limitation on toxic air emissions or any deviation from a restriction on the process or hours of operation, as established by the Director in order to maintain any toxic air contaminant below its MAGLC. The permittee shall also report any changes made, during the calendar quarter, to a parameter or value entered into the dispersion model that demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F). These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following:

a. Emission Limitation -

9.9 tons of VOC per rolling 12 month period.

Applicable Compliance Method -

Compliance shall be demonstrated through the record keeping requirements specified in section d), as established in this permit.

b. Emissions Limitation:

9.4 TPY of combined VOC emissions from liquid organic cleanup materials employed in emissions units K001, K004, K005, K006, K007, K010, K011, K012, K013, K014, and K015.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements specified in section d), as established in this permit.

g) Miscellaneous Requirements

(1) None.