

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Interim Director

1/21/2014

Certified Mail

Mrs. Donna Arway
Chase Industries, Inc
10021 Commerce Park Drive
Cincinnati, OH 45246

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1409000716
Permit Number: P0115964
Permit Type: Renewal
County: Butler

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 Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: SWOAQA



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Chase Industries, Inc**

Facility ID:	1409000716
Permit Number:	P0115964
Permit Type:	Renewal
Issued:	1/21/2014
Effective:	1/21/2014
Expiration:	1/21/2019



**Division of Air Pollution Control
Permit-to-Install and Operate**

for
Chase Industries, Inc

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Authorization

Facility ID: 1409000716
Application Number(s): A0049504
Permit Number: P0115964
Permit Description: Renewal of PTIO for emissions units K001 (Open Air Brushing and Spraying Operation) and K002 (Adhesive Coating Line).
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 1/21/2014
Effective Date: 1/21/2014
Expiration Date: 1/21/2019
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

Chase Industries, Inc
10021 Commerce Park Drive
Cincinnati, OH 45246

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

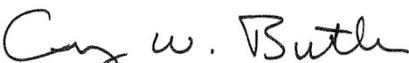
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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


Craig W. Butler
Interim Director



Final Permit-to-Install and Operate

Chase Industries, Inc

Permit Number: P0115964

Facility ID: 1409000716

Effective Date: 1/21/2014

Authorization (continued)

Permit Number: P0115964

Permit Description: Renewal of PTIO for emissions units K001 (Open Air Brushing and Spraying Operation) and K002 (Adhesive Coating Line).

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

Emissions Unit ID:	K001
Company Equipment ID:	Open Area Brushing and Spraying
Superseded Permit Number:	P0106429
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Adhesive Coating Line
Superseded Permit Number:	P0096348
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Chase Industries, Inc
Permit Number: P0115964
Facility ID: 1409000716
Effective Date: 1/21/2014

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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



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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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



Final Permit-to-Install and Operate
Chase Industries, Inc
Permit Number: P0115964
Facility ID: 1409000716
Effective Date: 1/21/2014

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) 2., 3., 4., 5., 6., 7., 8., and 9.

2. The actual emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001 (Open Air Brushing and Spraying Operation), K002 (Adhesive Coating Line), any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined, shall not exceed 9.9 tons per year (TPY) for any single HAP, as a rolling, 12-month summation and 24.9 TPY for any combination of HAPs, as a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

3. The total allowable emissions of organic compound (OC)/volatile organic compound (VOC) from emissions units K001 (Open Area Brushing and Spraying Operation), K002 (Adhesive Coating Line), any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined, shall not exceed 99.9 tons per year (TPY). Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

4. The permittee shall collect and record the following information each month for the emissions units identified in 2. above:
 - a) the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;
 - b) the name/identification of each individual HAP contained in each material applied (and identified in [a] above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;
 - c) the number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;
 - d) for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of [b] times [c] for all the materials applied during the month, divided by 2,000 pounds;



- e) the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from [d] above;
- f) for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in [d] above, for the present month plus the previous 11 months of operation, in ton(s); and
- g) the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in [e] above, for the present month plus the previous 11 months of operation, in ton(s).

A listing of the 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 and cleanup materials.

- 5. The permittee shall collect and record the following information each month for the emissions units identified in 3. above:
 - a) The name and identification number of each coating or material employed.
 - b) The OC/VOC content of each coating or material, in pounds of OC/VOC per gallon of coating or material, as applied.
 - c) The number of gallons of each coating or material employed.
 - d) The name and identification number of each cleanup material employed.
 - e) The OC/VOC content of each cleanup material, in pounds of OC/VOC per gallon of cleanup material, as applied.
 - f) The number of gallons of each cleanup material employed.
 - g) The total OC/VOC emissions from all coatings, materials, and cleanup materials employed, in pounds or tons [the sum of b) times c) for all coatings or materials plus the sum of e) times f) for all cleanup materials, and divided by 2,000 pounds per ton, if the units are in tons].
 - h) The updated rolling, 12-month summation of OC/VOC emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.
- 6. The permittee shall notify the Southwestern Ohio Air Quality Agency of any exceedance of the HAP emission limitations outlined in 2. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June, and July through September, respectively).
- 7. The permittee shall notify the Southwestern Ohio Air Quality Agency of any exceedance of the OC/VOC emission limitation outlined in 3. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June, and July through September, respectively).



8. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling 12-month summation for the emissions units listed in 2.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be demonstrated by the record keeping requirements specified in 3.

9. Emission Limitation:

99.9 TPY for OC/VOC, based on a rolling 12-month summation for the emissions units listed in 3.

Applicable Compliance Method:

Compliance with the OC/VOC emission limitation shall be demonstrated by the record keeping requirements specified in 5.



Final Permit-to-Install and Operate
Chase Industries, Inc
Permit Number: P0115964
Facility ID: 1409000716
Effective Date: 1/21/2014

C. Emissions Unit Terms and Conditions



1. K001, Open Area Brushing and Spraying

Operations, Property and/or Equipment Description:

Open Air Brushing and Spraying Operation

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

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

a. d)(6) and d)(7).

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

a. b)(1)c., c)(1) through c)(6), d)(4)d., d)(4)e., d)(4)f. d)(5)d., d)(5)e., d)(5)f. and e)(2).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 238.4 pounds per day when coating non-metal parts. Volatile organic compound (VOC) emissions shall not exceed 34.7 pounds per day when coating metal parts. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-21-09(U)(1)(c)	The VOC content specified by this rule is less stringent than the VOC content established pursuant to OAC 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V and Federal New Source Review Permitting	See sections B.2. through B.9., and c)(1) through c)(6). Volatile organic compound (VOC) emissions shall not exceed 2.84 tons per year (TPY), based on a rolling, 12-month summation, when coating metal parts. Organic compound (OC) emissions shall not exceed 19.5 tons per year (TPY), based on a rolling, 12-month summation, when coating non-metal parts. Organic compound (OC) emissions shall not exceed 5.64 tons per year (TPY), based on a rolling, 12-month summation, from cleanup materials.
d.	OAC rule 3745-17-11(C)	Exempt per OAC rule 3745-17-11(A)(1)(h) and (j).

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the specified mass emission limitations, OC and VOC content limitations, and usage restrictions.

c) Operational Restrictions

- (1) The maximum coating usage for this emissions unit shall not exceed 34.75 gallons per day and 5,685 gallons per year, including water and exempt solvents, for coating non-metal parts. The annual coating usage limitation shall be based upon a rolling, 12-month summation.
- (2) The maximum coating usage for this emissions unit shall not exceed 15 gallons per day and 2,460 gallons per year, excluding water and exempt solvents, for coating metal parts. The annual coating usage limitation shall be based upon a rolling, 12-month summation.
- (3) The maximum cleanup material usage for this emissions unit shall not exceed 1,670 gallons per year. The annual cleanup material usage limitation shall be based upon a rolling, 12-month summation.
- (4) The OC content of any coating employed when coating non-metal parts in this emissions unit shall not exceed 6.86 pounds per gallon, as applied, including water and exempt solvents.



- (5) The VOC content of any coating employed when coating metal parts in this emissions unit shall not exceed 2.31 pounds per gallon, as applied, excluding water and exempt solvents.
 - (6) The OC content of any cleanup material employed for this emissions unit shall not exceed 6.75 pounds per gallon.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall collect and record the following information for each day when coating non-metal parts for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the OC content of each coating, in pounds per gallon, as applied;
 - c. the volume, in gallons, of each coating employed;
 - d. the total volume, in gallons, of all coatings employed [summation of d. for all coatings employed during the day]; and
 - e. the daily OC emissions, in pounds [summation of b. x c. for all coatings employed during the day].
 - (2) The permittee shall collect and record the following information each day when coating metal parts for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the VOC content of each coating, in pounds per gallon, as applied, excluding water and exempt solvents;
 - c. the volume, in gallons, excluding water and exempt solvents, of each coating employed;
 - d. the total volume, in gallons, excluding water and exempt solvents, of all coatings employed [summation of c. for all coatings employed during the day]; and
 - e. the daily VOC emissions, in pounds [summation of b. x c. for all coatings employed during the day].
 - (3) The permittee shall collect and record the following information for each month for the cleanup materials employed in this emissions unit:
 - a. the company identification of each cleanup material employed;
 - b. the OC content of each cleanup material employed, in pounds per gallon;
 - c. the volume, in gallons, of each cleanup material employed;



- d. the total volume, in gallons, of all cleanup materials employed [summation of d. for cleanup materials employed; and
 - e. the OC emissions, in pounds [summation of b. x c. for all cleanup materials employed.
- (4) The permittee shall maintain monthly records of the following information for this emissions unit:
- a. the total volume, in gallons, of all coatings employed for non-metal parts (summation of d)(1)d. for all days of the calendar month);
 - b. the total volume, in gallons, excluding water and exempt solvents, of all coatings employed for metal parts (summation of d)(2)d. for all days of the calendar month);
 - c. the total volume, in gallons, of all cleanup materials employed (summation of d)(3)d. for the calendar month);
 - d. the updated rolling, 12-month summation of all coatings employed for non-metal parts, in gallons;
 - e. the updated rolling, 12-month summation of all coatings employed for metal parts, in gallons, excluding water and exempt solvents; and
 - f. the updated rolling, 12-month summation of all cleanup materials employed, in gallons.
- (5) The permittee shall maintain monthly records of the following information for this emissions unit:
- a. the total OC emissions, in pounds, from all coatings employed for non-metal parts (summation of d)(1)e. for all days of the calendar month);
 - b. the total VOC emissions, in pounds, from all coatings employed for metal parts (summation of d)(2)e. for all days of the calendar month);
 - c. the total OC emissions, in pounds, from all cleanup materials employed (summation of d)(3)e. for the calendar month);
 - d. the updated rolling, 12-month summation of all OC emissions from coatings employed for non-metal parts, in tons;
 - e. the updated rolling, 12-month summation of all VOC emissions from coatings employed for metal parts, in tons; and
 - f. the updated rolling, 12-month summation of all OC emissions from cleanup materials employed, in tons.



- (6) The federally enforceable permit to install and operate for this emissions unit (K001) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: stoddard solvent

TLV (ug/m3): 573,000

Maximum Hourly Emission Rate (lbs/hr): 6.71

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 1124

MAGLC (ug/m3): 13,643

Pollutant: heptane

TLV (ug/m3): 1,639,000

Maximum Hourly Emission Rate (lbs/hr): 15.44

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 2586

MAGLC (ug/m3): 39,024

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

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;



- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (7) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final federally enforceable permit to install and operate prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. when computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- e) Reporting Requirements
- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:



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

allexceedances of the OC/VOC content limitations specified in c)(4), c)(5), and c)(6);

all exceedances of the rolling, 12-month coating and cleanup material usage restrictions specified in c)(1), c)(2), and c)(3);

allexceedances of the rolling, 12-month emission limitations for OC/VOC emissions specified in b)(1)c.;

allexceedances of the rolling, 12-month emission limitation for OC/VOC emissions specified in Section B.3.; and

allexceedances of the rolling, 12-month emission limitations for HAP emissions specified in Section B.2.

- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

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

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

- a. OC emissions shall not exceed 238.4 pounds per day, when coating non-metal parts.



Applicable Compliance Method:

Compliance with the daily OC emission limitation when coating non-metal parts identified in b)(1)a. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual daily OC emissions for emissions unit K001 shall be determined based on the following equation:

OC = Sum of [(gallons of coating employed in gallons per day) x (OC content of coating in pounds per gallon)] for each coating material employed per day when coating non-metal parts.

b. Emission Limitation:

VOC emissions shall not exceed 34.7 pounds per day, when coating metal parts.

Applicable Compliance Method:

Compliance with the daily VOC emission limitation when coating metal parts identified in b)(1)a. shall be demonstrated by the record keeping requirement identified in d)(2).

Actual daily VOC emissions for emissions unit K001 shall be determined based on the following:

VOC = Sum of [(gallons of coating employed in gallons per day) x (VOC content of coating in pounds per gallon)] for each coating material employed per day when coating metal parts.

c. Emission Limitation:

VOC emissions shall not exceed 2.84 TPY, based on a rolling, 12-month summation, when coating metal parts.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation identified in b)(1)c. shall be demonstrated by the record keeping requirement identified in d)(5).

Actual VOC emissions when coating metal parts for emissions unit K001 shall be determined based on the following equation:

VOC = Sum of [(gallons of coating employed) x (VOC content of coating) / (2000 lbs per ton)] for each coating material employed when coating metal parts.



d. Emission Limitation:

Organic compound (OC) emissions shall not exceed 19.5 tons per year (TPY), based on a rolling, 12-month summation, when coating non-metal parts.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(1)c. shall be demonstrated by the record keeping requirement identified in d)(5).

Actual OC emissions when coating non-metal parts for emissions unit K001 shall be determined based on the following:

OC = Sum of [(gallons of coating employed) x (OC content of coating) / (2000 lbs per ton)] for each coating material employed when coating non-metal parts.

e. Emission Limitation:

OC emissions shall not exceed 5.64 TPY, based on a rolling, 12-month summation, from cleanup materials.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(1)c. shall be demonstrated by the record keeping requirement identified in d)(5).

Actual OC emissions from cleanup materials for emissions unit K001 shall be determined based on the following equation:

OC = Sum of [(gallons of cleanup materials employed) x (OC content of cleanup material) / (2000 lbs per ton)] for each cleanup material employed.

f. OC/VOC Content Limitations:

OC content of any coating shall not exceed 6.86 pounds per gallon, including water and exempt solvents, when coating non-metal parts.

VOC content of any coating shall not exceed 2.31 pounds per gallon, excluding water and exempt solvents, when coating metal parts.

OC content of any cleanup material shall not exceed 6.75 pounds per gallon.

Applicable Compliance Method:

In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren, and Wood Counties shall use USEPA Method 24 to determine the OC/VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use



formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

USEPA Method 24 or formulation data shall be used to determine the OC contents of the cleanup materials.

Compliance with these OC/VOC content limitations shall be demonstrated by the record keeping requirements specified in d)(1), d)(2), and d)(3).

g. Usage Restriction:

Coating usage shall not exceed 34.75 gallons per day and 5,685 gallons per year, including water and exempt solvents, when coating non-metal parts, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the daily coating usage restriction for non-metal parts shall be determined by the record keeping requirements specified in d)(1).

Compliance with the annual coating usage restriction for non-metal parts shall be determined by the record keeping requirements specified in d)(4).

h. Usage Restriction:

Coating usage shall not exceed 15 gallons per day and 2,460 gallons per year, excluding water and exempt solvents, when coating metal parts, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the daily coating usage restriction for metal parts shall be determined by the record keeping requirements specified in d)(2).

Compliance with the annual coating usage restriction for metal parts shall be determined by the record keeping requirements specified in d)(4).

i. Usage Restriction:

Cleanup material usage shall not exceed 1,670 gallons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual cleanup material usage restriction shall be determined by the record keeping requirements specified in d)(4).

g) Miscellaneous Requirements

- (1) None.



2. K002, Adhesive Coating Line

Operations, Property and/or Equipment Description:

Adhesive Coating Line

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)e.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 55 pounds per day and 2.48 TPY.</p> <p>Particulate Emissions (PE) and Particulate Emissions 10 microns and less in diameter (PM10) shall not exceed 0.551 pound per hour and 2.41 TPY.</p> <p>See b)(2)a. and c)(1).</p>
b.	OAC rule 3745-21-09(U)(1)	Exempt per OAC rule 3745-21-09(U)(2)(f)(ii).
c.	OAC rule 3745-17-07(A)(1)	See b)(2)c.
d.	OAC rule 3745-17-11(C)(1) and (C)(2)	Exempt per OAC rule 3745-17-11(C).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V and Federal New Source Review Permitting	See sections B.2. through B.9.

(1) Additional Terms and Conditions

- a. The VOC content of each adhesive employed shall not exceed 5.5 pounds of VOC per gallon of adhesive, as applied.
- b. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by usage limitations, emissions limitations and VOC content limitations outlined in this permit.
- c. Visible particulate emissions shall not exceed 20 percent opacity, as a six minute average, except as specified by rule.

c) Operational Restrictions

- (1) Adhesive usage shall not exceed 10 gallons per day and 900 gallons per year.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day:
 - a. The name and identification number of the adhesive employed.
 - b. The VOC content of each adhesive, in pounds per gallon, as applied.
 - c. The solids content of each adhesive, in pounds per gallon, as applied.
 - d. The volume, in gallons (as applied), of each adhesive employed.
 - e. The total VOC emissions from all adhesives employed per day (the sum of b. x d. for all the adhesives employed per day)

e) Reporting Requirements

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically



identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

- (2) Compliance with the daily and annual adhesive usage limitations outlined in c)(1) shall be demonstrated by the recordkeeping requirements outlined in d)(1).

- (3) Emission Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 55 pounds per day and 2.48 TPY.

Applicable Compliance Method:

Compliance with the daily and annual VOC emission limitations outlined in b)(1) shall be demonstrated by the recordkeeping requirements outlined in d)(1).

- (4) Visible Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

- (5) Emission Limitation:

Particulate Emissions (PE) and Particulate Emissions 10 microns and less in diameter (PM10) shall not exceed 0.551 pound per hour and 2.41 TPY.



Applicable Compliance Method:

This hourly emission limitation is based on the allowable as specified in OAC rule 3745-17-11. PM10 emissions are assumed to be equal to PE emissions. Compliance with this limitation was demonstrated using the following calculation in PTI 14-04406 issued October 22, 1997:

$$A \times B \times (1-C) \times (1-D)$$

$$A = \text{gallons of adhesive employed/hour} = 0.76$$

$$B = \text{solids content in lbs/gallon} = 1.24$$

$$C = \text{transfer efficiency in percent} = 40 \text{ percent}$$

$$D = \text{control efficiency in percent} = 90 \text{ percent}$$

The annual particulate emissions limitation was developed by multiplying the hourly emission limitation of 0.551 pound per hour by 8760 hours per year and then converting to tons.

g) Miscellaneous Requirements

(1) None.