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

1/23/2014

Certified Mail

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

HAROLD FITZ
TRANSCO RAILWAY PROD INC
PO BOX 231
BUCYRUS, OH 44830

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0317010035
Permit Number: P0115318
Permit Type: Renewal
County: Crawford

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-NWDO

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
TRANSCO RAILWAY PROD INC

Facility ID:	0317010035
Permit Number:	P0115318
Permit Type:	Renewal
Issued:	1/23/2014
Effective:	1/23/2014
Expiration:	1/23/2019

Division of Air Pollution Control
Permit-to-Install and Operate
for
TRANSCO RAILWAY PROD INC

Table of Contents

Authorization 1

A. Standard Terms and Conditions 3

1. What does this permit-to-install and operate ("PTIO") allow me to do? 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them? 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
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? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6
13. Can I transfer this permit to a new owner or operator? 6
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7
15. What happens if a portion of this permit is determined to be invalid? 7

B. Facility-Wide Terms and Conditions 8

C. Emissions Unit Terms and Conditions 10

1. K002, Paint Room 11
2. P002, Shot Blast Room 17

Authorization

Facility ID:	0317010035
Application Number(s):	A0048635, A0048875, A0048876
Permit Number:	P0115318
Permit Description:	Renewal FEPTIO for one paint room and a railcar shot blast room.
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	1/23/2014
Effective Date:	1/23/2014
Expiration Date:	1/23/2019

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

This document constitutes issuance to:

TRANSCO RAILWAY PROD INC
820 HOPLEY AVE
BUCYRUS, OH 44820

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Interim Director

Authorization (continued)

Permit Number: P0115318
Permit Description: Renewal FEPTIO for one paint room and a railcar shot blast room.

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

Emissions Unit ID:	**K002**
Company Equipment ID:	Paint Room
Superseded Permit Number:	P0086842
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	Rail car shot blast room
Superseded Permit Number:	P0105005
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. K002, Paint Room

Operations, Property and/or Equipment Description:

Paint Room

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. g)(1).

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

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

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)	44.31 pounds (lbs) volatile organic compounds (VOC)/hour (hr) (includescoating and cleanup operations). See b)(2)a.
b.	OAC rule 3745-31-05(D)	80.0 tons VOC per rolling, 12-monthperiod (includes coating and cleanupoperations). 9.9 tons per rolling, 12- month periodfor any individual Hazardous AirPollutant (HAP) and 24.9 tons perrolling, 12-month period for anycombination of HAPs for emission unit K002. See b)(2)b. and b)(2)c.
c.	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds volatile organic compounds (VOCs) per gallon, excluding water and exempt solvents, for an extreme

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		performance coating

(2) Additional Terms and Conditions

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

b. The emissions of VOC from emissions unit K002 shall not exceed 80.0 tons per year based on a rolling, 12- month summation of the monthly emissions. The federally enforceable VOC limitation is based on a coating usage restriction [See c)(1)] and a maximum coating VOC content of 3.5 lbs/gallon established by OAC rule 3745-21-09 (U)(1)(c). Federally enforceable VOC limitations are being established for the purpose of avoiding Title V applicability.

c. HAP emissions from emissions unit K002 shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based on a rolling, 12 - month summation of the monthly HAP emissions. Federally enforceable HAP limitations are being established for the purpose of avoiding Title V and MACT applicability.

c) Operational Restrictions

(1) The maximum rolling 12-month usage rate of VOC containing materials for emissions unit K002 is limited by the following equation:

$$\sum_{M=1}^{12}\sum_{n}[(U_n)(C_n)\left(\frac{1\ ton}{2000\ lbs}\right)]\ \leq 80.0$$

Where:

M = the increment of the rolling 12-month period;
n = the increment of the VOC containing material during the period;
U_n = total amount of the individual VOC containing material, in gallons.
C_n = VOC content for the individual VOC containing material in pounds per gallon

Compliance with the annual usage restriction shall be based upon a rolling, 12-month summation.

(2) HAP emissions from emissions unit K002 shall not exceed 9.9 tons of any individual HAP and 24.9 tons for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions.

Compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for emissions unit K002:

a. the company name and identification for each coating and cleanup material employed;

b. the VOC content of each coating and cleanup material, as applied, in lbs/gallon;

c. the VOC content of each coating (excluding water and exempt solvents), in lbs/gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B) (8) of OAC rule 3745-21-10 for $C_{VOC,2}$];

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

e. The VOC emissions for each individual VOC containing material processed, in tons/month, calculated as follows:

$$E_n = [(U_n)(C_n)(1\text{ton}/2000\text{ lbs})]$$

E_n = VOC emissions from an individual VOC containing material

U_n = total throughput of the individual VOC containing material, in gallons

C_n = VOC content for the individual VOC containing material in lbs VOC per gallon

f. The total VOC emission rate of all aggregate processed, in tons/month, calculated as follows:

$$E_M = E_1 + E_2 + E_3 + ... + E_n$$

Where:

E_M = Monthly VOC emissions, in tons/month; and,
E_n = VOC emissions from each individual VOC containing material [d)(1)b.]

g. The rolling, 12-month VOC emission rate calculated as follows:

$$E_T = E_{M1} + E_{M2} + E_{M3} + ... + E_{M12}$$

Where:

E_T =Annual VOC emissions (tons) as summed from the previous 12 months of monthly VOC emissions;
E_M =Monthly VOC emissions (tons/month).

* The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material] x solvent density.

(2) The permittee shall collect and record the following information regarding HAP emissions each month for emission unit K002:

a. the company identification of each coating and cleanup material employed;

b. the lbs per gallon of each HAP in each coating and cleanup material, as applied;

c. the number of gallons of each coating and cleanup material employed;

d. the total emission rate for each HAP from all coatings and cleanup materials employed, [summation of each HAP emission rate [c)(2)b. x c)(2)c.] for each individual coating/cleanup material], in lbs/month;

e. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed, [sum of c)(2)d. for all HAPs] in lbs/month; and

f. the annual emissions of each HAP and the combination of all HAPs, in tons, based upon the rolling, 12-month summations.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(2) The permittee shall submit 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 exceedances of the maximum emission limitations for each HAP and total combined HAPs specified in paragraph b)(2)c. of this permit;

ii. any exceedances of the 80.0 tons including (coating and cleanup materials) VOC per rolling, 12-month period; and

iii. anyexceedances of the rolling 12-month usage rate for VOC containing material.

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

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

(3) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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. <u>Emission Limitation:</u>
44.31 lbs VOC/hr

<u>Applicable Compliance Method:</u>
The hourly VOC emission limitation is based on the emission unit's potential to emit*. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

If required, the permittee shall demonstrate compliance with the hourly emission limitation above in accordance with Methods 1 – 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60 Appendix A.

*The potential to emit for this emissions unit was based on a maximum hourly coating usage of 12.66 gallons and a maximum VOC content of 3.5 pounds per gallon.

b. <u>Emission Limitation:</u>
80.0 tons of VOC/year (including coating and cleanup operations)

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements as specified in d)(1).

c. Emission Limitation:
9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling 12-month period for any combination of HAPs for emissions unit K002.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements as specified in d)(2).

g) Miscellaneous Requirements

(1) Pursuant to Engineering guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the modification resulted in an annual emissions increase of less than 1 ton for each toxic compound. OAC Chapter 3745-31 requires permittee to apply for and obtain a new or modified permit to install 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 result in an increase in emissions of any pollutant that has listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

2. P002, Shot Blast Room

Operations, Property and/or Equipment Description:

Rail car shot blast room.

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Use of two baghouses 0.015 grain per dry standard cubic foot 3.86 lbs particulate emissions (PE)/hr, 16.91 tons PE/year See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-07(A)	Visible emissions shall not exceed 20% opacity, as a six-minute average except as provided by rule.
c.	OAC rule 3745-17-11(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. All PE is assumed to be PM10.

b. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-17-07(A).

c. The emissions limitation specified by this rules is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05 (A)(3).

c) Operational Restrictions

(1) The permittee shall employ two baghouses to control particulate emissions from this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

f) Testing Requirements

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

a. Emission Limitations:
3.86 lbs PE/hr, 16.91 tons PE/year

Applicable Compliance Method:
Compliance may be determined by multiplying the maximum baghouse outlet concentration of 0.015 gr/dscf by the baghouses' combined maximum volumetric air flow rate (30,000 acfm), then multiplying by lb/7000 grains and 60 minutes/hour.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum annual operating schedule of 8760 hours per year and then dividing by 2000 pounds per ton. Therefore, provided compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitation:
0.015 grain/dscf

Applicable Compliance Method:
The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the baghouses. If required, compliance with the emission limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

c. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.