

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

2/4/2014

Certified Mail

SAM SHARABA
CARTRUCK PACKAGING
7315 ASSOCIATE AVENUE
BROOKLYN, OH 44144

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318108387
Permit Number: P0115766
Permit Type: Administrative Modification
County: Cuyahoga

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	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

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 Cleveland Division of Air Quality at (216)664-2297 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: CDAQ



FINAL

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

Facility ID:	1318108387
Permit Number:	P0115766
Permit Type:	Administrative Modification
Issued:	2/4/2014
Effective:	2/4/2014
Expiration:	11/16/2022



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

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Final Permit-to-Install and Operate
CARTRUCK PACKAGING
Permit Number: P0115766
Facility ID: 1318108387
Effective Date: 2/4/2014

Authorization

Facility ID: 1318108387
Application Number(s): M0002466
Permit Number: P0115766
Permit Description: Administrative modification for emissions unit K004 which had a xylene limitation of 1.33 lbs/gal. The facility has requested to remove this limitation in order to be able to use a coating called ALK200 which has a xylene content of 3.14 lbs/gal . In addition, facility has permanently shut down emissions unit K006 and has relocated K005 to where their other spray booths are located.
Permit Type: Administrative Modification
Permit Fee: \$100.00
Issue Date: 2/4/2014
Effective Date: 2/4/2014
Expiration Date: 11/16/2022
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

CARTRUCK PACKAGING
7315 ASSOCIATE AVENUE
Brooklyn, OH 44144

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:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

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
CARTRUCK PACKAGING
Permit Number: P0115766
Facility ID: 1318108387
Effective Date: 2/4/2014

Authorization (continued)

Permit Number: P0115766

Permit Description: Administrative modification for emissions unit K004 which had a xylene limitation of 1.33 lbs/gal. The facility has requested to remove this limitation in order to be able to use a coating called ALK200 which has a xylene content of 3.14 lbs/gal. In addition, facility has permanently shut down emissions unit K006 and has relocated K005 to where their other spray booths are located.

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

Emissions Unit ID:	K004
Company Equipment ID:	Coating Line #4
Superseded Permit Number:	P0109632
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
CARTRUCK PACKAGING
Permit Number: P0115766
Facility ID: 1318108387
Effective Date: 2/4/2014

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
CARTRUCK PACKAGING
Permit Number: P0115766
Facility ID: 1318108387
Effective Date: 2/4/2014

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) None.
2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations Area Sources. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



Final Permit-to-Install and Operate
CARTRUCK PACKAGING
Permit Number: P0115766
Facility ID: 1318108387
Effective Date: 2/4/2014

C. Emissions Unit Terms and Conditions



1. **K002, Coating Line #2**

Operations, Property and/or Equipment Description:

Spray booth (Line #2) for the coating of miscellaneous metal parts

- 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)(8) – d)(10), and e)(2).
 - (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) PTI 13-04213 issued 10/12/2004	<p>Volatile organic compound (VOC) emissions shall not exceed 35 lbs/day and 6.4 tons per year from coatings and 0.54 TPY VOC from cleanup materials.</p> <p>The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(1)(d).</p> <p>See b)(2)a. below.</p>
b.	OAC rule 3745-17-07(A)	See b)(2)b. below.
c.	OAC rule 3745-17-11(C)	See c)(1) below.
d.	OAC rule 3745-21-09(U)(1)(d)	See b)(2)c. below.
e.	OAC rule 3745-114-01	See d)(8) through d)(10) below.



- (2) Additional Terms and Conditions
 - a. OAC rule 3745-17-07 does not apply because there is no limit from OAC rule 3745-17-11.
 - b. The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 pounds per gallon, as applied, excluding water and exempt solvents; and the coatings shall not be dried at temperatures that exceed 200 degrees Fahrenheit.
- c) Operational Restrictions
 - (1) The permittee shall operate, and maintain a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
 - (2) The maximum VOC content of each cleanup material employed in the emissions unit shall not exceed 7.2 pounds of VOC per gallon of cleanup material, as applied.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect and record the following information each day for the coating operations:
 - a. the name and identification number of each coating applied;
 - b. the VOC and HAP content of each coating as applied, in lbs/gallon;
 - c. the amount, in gallons, of each coating applied;
 - d. the VOC/HAP emissions from each coating applied, i.e., d)(1)b. times d)(1)c. for each coating, in pounds of VOC/day and pounds of HAP/day;
 - e. the daily VOC/HAP emissions from all the coatings applied, i.e., the sum of d)(1)d. for all coatings, in pounds of VOC/day and pounds of HAP/day;
 - f. the VOC content (excluding water and exempt solvents) of each coating as applied, calculated in accordance with f)(1)a. and the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$, in pounds VOC/gallon of coating; and
 - g. the daily volume-weighted average VOC content of all the coatings (excluding water and exempt solvents), as applied, calculated in accordance with f)(1)a. and the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $(C_{VOC,2})_A$.



- (2) The permittee shall collect and record the following information for each month for this emissions unit:
- a. the company identification of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the VOC content of each cleanup material employed, in pounds per gallon;
 - d. the total VOC emissions from all cleanup materials employed, in pounds, i.e., the sum of d)(2)b. times d)(2)c. for each cleanup employed;
 - e. if cleanup materials are collected for off-site disposal and/or recovery, the following records shall be maintained if a credit is to be applied to the monthly VOC emissions:
 - i. the amount of cleanup material recovered during the month* for off-site disposal and/or recovery, in gallons (or pounds, if records of recovered cleanup material is maintained by weight and VOC content in percent by weight);
 - ii. the VOC content of the recovered cleanup material shall be based on the lowest VOC content of any cleanup material collected, in pounds per gallon (or percent by weight); or it may be based upon a laboratory analyses provided by the facility to which the waste solvent is shipped;
 - iii. the date the recovered cleanup material was shipped, the amount shipped (minus the container), and the name and address of the receiving, disposal, and/or recovery facility; and
 - f. the total monthly VOC emission from cleanup operations, in pounds, i.e., [d)(2)d.] – [d)(2)e.i. x d)(2)e.ii.].
- * A daily log may be required for recovered waste cleanup solvents, where a record of the monthly total volume or weight of the collected material cannot be accurately maintained. This amount shall be adjusted if the volume or weight shipped is less than the sum of the monthly recovered solvent added to the container.
- (3) The permittee shall calculate and record the total annual VOC and HAP emissions from coatings and cleanup materials, i.e., the sum of the daily VOC and HAP emission rates from the coating materials for the calendar year in d)(1)e. plus the sum of the monthly emissions from cleanup materials for the calendar year in d)(2)d. or d)(2)f.
- (4) The permittee shall conduct periodic inspections of the dry filtration system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, and/or operating manual and/or in accordance with any documented modifications deemed necessary by the permittee. The inspection frequency shall be based upon the recommendation of the manufacturer.



- (5) In addition to the recommended periodic inspections, the permittee shall conduct a comprehensive inspection of the dry filtration system at least once per year while the coating operations are shut down and shall perform any needed maintenance and repair.
- (6) The permittee shall maintain the following information for the dry filtration system:
 - a. documentation of the manufacturer's recommendations, instructions, or operating manual, along with documentation of any modifications deemed necessary by the permittee;
 - b. any period(s) of time when the dry filtration system was not in service when the emissions unit was in operation;
 - c. any period(s) of time (during coating operations) when the dry filtration system was not operating according to the manufacturer's recommendations and/or according to documented modifications to the manufacturer's recommendations deemed necessary by the permittee; and
 - d. records for each inspection (periodic and annual) of the dry filtration system to include the following information:
 - i. the date of the inspection;
 - ii. a description of each/any problem identified and the date it was corrected;
 - iii. a description of any maintenance and repairs performed and the date; and
 - iv. the name of person who performed the inspection.
- (7) The manufacturer's operation manual, along with any documented modifications determined necessary by the permittee, shall be maintained at the facility at all times. Records of malfunction, maintenance, and inspections of the dry filtration system shall be maintained for a period of not less than five years from the date of record and shall be made available to the Ohio EPA upon request.
- (8) The permit to install/operate application for the emissions unit, K002, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:



- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Pollutant: toluene

TLV (ug/m3): 75,360

Maximum Hourly Emission Rate (lbs/hr): 1.46

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 210

MAGLC (ug/m3): 1,794

The permittee, has demonstrated that emissions of toluene, from emissions unit K002 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (9) Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can



affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions units or their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" 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 a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (10) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.



e) Reporting Requirements

- (1) The permittee shall include in the Permit Evaluation Report (PER) any record showing that the dry filtration system was not in service when this emissions unit was in operation.
- (2) The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any daily record showing that the daily volume-weighted average VOC content was greater than 3.5 lbs VOC/gallon, excluding water and exempt solvents. The notification shall include a copy of such record and it shall be sent to the Cleveland DAQ within 45 days after the exceedance occurs.
- (3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual PER. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (4) The permittee shall submit an annual PER to Cleveland DAQ 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements

- (1) Compliance with the emissions limitations and/or control requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 pounds per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1). The mass of VOC per volume of each coating, excluding water and exempt solvents, as applied, shall be calculated as follows:

$C_{VOC,2}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents.

$$C_{VOC,2} = (D_C)(W_{VOC}) / (V_S + V_{VOC})$$



where:

D_C = the density of coating, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

V_S = volume fraction of solids (nonvolatile matter) in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

The daily volume-weighted average VOC content (excluding water and exempt solvents) shall be determined using the following equation from OAC rule 3745-21-10(B)(9):

$$(C_{VOC,2})_A = \frac{\sum_{i=1}^n C_{VOC,2i} L_{Ci} (V_{Si} + V_{VOCi})}{\sum_{i=1}^n L_{Ci} (V_{Si} + V_{VOCi})}$$

Where,

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period t.

L_C = liquid volume of coating employed during time period t, in gallons of coating.

i = subscript denoting a specific coating employed during time period t.

n = total number of coatings employed during time period t.

t = time period specified for the weighted average VOC content.



b. Emission Limitation:

35 lbs VOC/day

Applicable Compliance Method:

Compliance shall be determined from the record keeping specified in d)(1).

c. Emission Limitation:

6.4 tons of VOC per year from coatings and 0.54 TPY VOC from cleanup materials

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(3).

- (2) In accordance with OAC rule 3745-21-04(B)(5), facilities shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, 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.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

g) Miscellaneous Requirements

- (1) None.



2. Emissions Unit Group -paint booths: K001,K003,K004,

EU ID	Operations, Property and/or Equipment Description
K001	Spray booth (line #1) for the coating of miscellaneous metal parts
K003	Spray booth (line #3) for the coating of miscellaneous metal parts
K004	Spray booth (line #4) for the coating of miscellaneous metal parts

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)(9) – d)(13), and e)(4).

(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) PTI 13-04213 issued 10/12/2004	Volatile organic compound (VOC) emissions shall not exceed 18.1 lbs/day and 3.3 TPY from coatings and 0.54 TPY from cleanup materials for each emissions unit. The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(2). See b)(2)a., and c) below.
b.	OAC rule 3745-17-07(A)(1)	See b)(2)a. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-11(B)	See b)(2)a. below.
e.	OAC rule 3745-21-09(U)(2)(e)(ii)	See c)(1) below.
e.	OAC rule 3745-114-01	See d)(9) through d)(11) below.

(2) Additional Terms and Conditions

a. These emissions units are exempt from visible emission limitation due to using less than 5 gallons coating per day and therefore exempt from OAC rule 3745-17-11(B).

c) Operational Restrictions

- (1) The permittee shall not use more than 3 gallons of coating material per day for the coating of miscellaneous metal parts.
- (2) Emissions units K001 and K003 shall not employ any coatings containing xylene.
- (3) All coating operations causing particulate air emissions shall occur only when the installed particulate matter control device (dry filters) is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- (2) The permittee shall collect and record the following information each day for each emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the VOC and HAP content of each coating employed, in pounds per gallon, as applied;
 - c. the number of gallons of each coating employed;
 - d. the total number of gallons of all the coatings employed; and
 - e. the total VOC and HAP emissions from all the coatings employed, in pounds [i.e., the sum of d)(2)b. times d)(2)c. for each coating employed].
- (3) The permittee shall collect and record the following information for each month for each emissions unit:
 - a. the company identification of each cleanup material employed;



- b. the number of gallons of each cleanup material employed;
 - c. the VOC content of each cleanup material employed, in pounds per gallon;
 - d. the total VOC emissions from all cleanup materials employed, in pounds [i.e., sum of d)(3)b. times d)(3)c. for each cleanup material employed];
 - e. the amount of cleanup material recovered, in pounds; and
 - f. the total monthly VOC emissions from cleanup operations, in pounds [i.e., d)(3)d. – d)(3)e.].
- (4) The permittee shall calculate and record the total annual VOC and HAP emissions from coatings and cleanup materials, [i.e., the sum of the daily VOC and HAP emission rates from the coating materials for the calendar year in d)(2) plus the sum of the monthly emissions from cleanup materials for the calendar year in d)(3)].
- (5) The permittee shall conduct periodic inspections of the dry filtration system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, and/or operating manual and/or in accordance with any documented modifications deemed necessary by the permittee. The inspection frequency shall be based upon the recommendation of the manufacturer.
- (6) In addition to the recommended periodic inspections, the permittee shall conduct a comprehensive inspection of the dry filtration system at least once per year while the coating operations are shut down and shall perform any needed maintenance and repair.
- (7) The permittee shall maintain the following information for the dry filtration system:
- a. documentation of the manufacturer's recommendations, instructions, or operating manual, along with documentation of any modifications deemed necessary by the permittee;
 - b. any period(s) of time when the dry filtration system was not in service when the emissions unit was in operation;
 - c. any period(s) of time (during coating operations) when the dry filtration system was not operating according to the manufacturer's recommendations and/or according to documented modifications to the manufacturer's recommendations deemed necessary by the permittee; and
 - d. records for each inspection (periodic and annual) of the dry filtration system to include the following information:
 - i. the date of the inspection;
 - ii. a description of each/any problem identified and the date it was corrected;



- iii. a description of any maintenance and repairs performed and the date; and
 - iv. the name of person who performed the inspection.
- (8) The manufacturer's operation manual, along with any documented modifications determined necessary by the permittee, shall be maintained at the facility at all times. Records of malfunction, maintenance, and inspections of the dry filtration system shall be maintained for a period of not less than five years from the date of record and shall be made available to the Ohio EPA upon request.
- (9) The permit to install for these emissions unit (K001, K003, K004) 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 potentially 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), which has been adjusted for a 6 day and 12 hour per day work week. The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: Toluene
TLV (ug/m3): 75,360
Maximum Hourly Emission Rate (lbs/hr): 1.46
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 210
MAGLC (ug/m3): 1,794
- Pollutant: xylene
TLV (ug/m3): 434,196
Maximum Hourly Emission Rate (lbs/hr): 2.1
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 311
MAGLC (ug/m3): 10,338
- Pollutant: methyl isobutyl ketone
TLV (ug/m3): 81,900
Maximum Hourly Emission Rate (lbs/hr): 0.73
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 108.4
MAGLC (ug/m3): 1950
- (10) Physical changes to or changes in the method of operation of the emissions unit after its installation 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 be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (11) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is/are defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
- (12) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- (13) 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.



e) Reporting Requirements

- (1) The permittee shall include in the Permit Evaluation Report (PER) any record showing that the dry filtration system was not in service when this emissions unit was in operation.
- (2) The permittee shall notify the Cleveland DAQ in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 3 gallons per day. The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 45 days after the exceedance occurs.
- (3) The permittee shall submit an annual PER to Cleveland DAQ 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual PER. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

- (1) Compliance with the emissions limitations and/or control requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:
3 gallons per day total coating usage
Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in d)(2)d.
 - b. Emissions Limitation:
18.1 lbs. per day of VOC emissions from coatings for each emissions unit
Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in d)(2)e.



c. Emissions Limitation:

3.3 TPY of VOC emissions from coatings and 0.54 TPY VOC from cleanup materials for each emissions unit

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(4).

- (2) In accordance with OAC rule 3745-21-04(B)(5), facilities shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, 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.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

g) Miscellaneous Requirements

- (1) None.