

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

2/25/2014

Certified Mail

KEVIN DEIGHAN
W S TYLER
8570 TYLER BLVD
MENTOR, OH 44060

Facility ID: 0243081244
Permit Number: P0116191
County: Lake

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Initial

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Lake County News-Herald. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically 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. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,



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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-NEDO; Pennsylvania

PUBLIC NOTICE
2/25/2014 Issuance of Draft Air Pollution Title V Permit

W S TYLER
8570 TYLER BLVD,
Mentor, OH 44060
Lake County

FACILITY DESC.: Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to
Manufacturers

PERMIT #: P0116191

PERMIT TYPE: Initial

PERMIT DESC: Initial Title V permit for WS Tyler, a manufacturer of test sieves. Emissions units include a
halogenated solvent vapor degreaser and spray booth.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and
complete instructions for requesting information or submitting comments may be obtained at:
<http://epa.ohio.gov/dapc/permitonline.aspx> by entering the permit # or: John Polak, Ohio EPA DAPC,
Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171



Statement of Basis
 W S TYLER
 Permit Number: P0116191
 Facility ID: 0243081244

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0243081244
Facility Name:	W S TYLER
Facility Description:	Manufacturer of metal test sieves for particle sizing.
Facility Address:	8570 TYLER BLVD, Mentor, OH 44060
Permit #:	P0116191, Initial
This facility is subject to Title V because it is major for: <input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input type="checkbox"/> Carbon Monoxide <input type="checkbox"/> Volatile Organic Compounds <input type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Particulate Matter ≤ 10 microns <input type="checkbox"/> Single Hazardous Air Pollutant <input type="checkbox"/> Combined Hazardous Air Pollutants <input checked="" type="checkbox"/> Maximum Available Control Technology Standard(s) <input type="checkbox"/> GHG <input type="checkbox"/> Title IV	

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A



Statement of Basis
 W S TYLER
 Permit Number: P0116191
 Facility ID: 0243081244

Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	N/A

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	



C. Emissions Unit Terms and Conditions

Key:													
EU = emissions unit ID							R = record keeping requirements						
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)							Rp = reporting requirements						
OR = operational restriction							ET = emission testing requirements (not including compliance method terms)						
M = monitoring requirements							St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement						
ENF = did noncompliance issues drive the monitoring requirements?							Misc = miscellaneous requirements						
EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
K001	Volatile organic compound (VOC) emissions shall not exceed 22.2 pounds per day from coatings, and 4.55 tons per year, including both coatings and cleanup materials.	31-05(A)(3)		N	N	N	N	Y	Y	N	N	N	R – On a daily, and monthly basis identify each coating employed, VOC content, number of gallons employed, and total VOC emissions from coatings and cleanup. R – On an annual basis record the total annual VOC emissions from coatings and cleanup materials. Rp – Annual compliance reports that includes allowable emissions limits and whether the emissions unit (EU) is in compliance with requirements listed.
K001	Particulate emissions (PE) shall not exceed 0.551 pounds per hour and 2.4 tons per year from coatings.	31-05(A)(3)		N	Y	Y	N	Y	Y	N	N	N	OR – Use of dry filtration system for control of particulate whenever emissions unit is in operation. M – Make sure dry filtration system is in use while in operation. R – Daily records of any time dry filtration system was not in service when the EU was in operation. Rp – Notification when dry filtration system was not in service when the EU was in operation.
K001	The permittee shall not use more than 3 gallons of coating material per day for the coating of miscellaneous metal parts.	21-09(U)(2)(e)(ii)		N	Y	N	N	Y	Y	N	N	N	OR – Shall not use >3 gallons of coating material per day R – Total number of gallons of each coating employed Rp – Notification any day showing the coating line employed >3 gallons.



Statement of Basis
 W S TYLER
 Permit Number: P0116191
 Facility ID: 0243081244

K001	None.	17-11(B)(1)		Y	N	N	N	N	N	N	N	N	N	ND - The requirements established pursuant to this rule are equivalent to the short term particulate emission limitation included in OAC rule 3745-31-05(A)(3).
K001	Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.	17-07(A)(1)		N	Y	Y	N	N	N	N	N	N	N	OR – Visible PE shall not exceed 20% opacity as a six-minute average. M – Visible emissions evaluations in pursuant to Method 9.
L002	VOC emissions shall not exceed 6.21 tons per year.	31-05(A)(3), as effective 11/30/2001.		N	N	N	N	N	N	N	N	N	N	
L002	Controlled PTE for the emissions of VOC are less than 10 tons per year.	31-05(A)(3), as effective 12/06/2006.		N	N	N	N	N	N	N	N	N	N	
L002	150 kg TCE/square meter/month, as a 3-month rolling average.		Subpart T of 40 CFR, Part 63	N	Y	N	N	Y	Y	N	N	N	N	OR – Cleaning machine must have clean solvent and filled to the same line on the first day every month. OR – Monthly emissions shall not exceed 150 kg/square meter/month as a 3–month rolling average. R – Shall maintain following records for the lifetime of the cleaning machine: owners manual, or written maintance and operating procedures for solvent cleaning machine, records of halogenated HAP, TCE solvent content for each solvent used, and date of installation for the solvent cleaning machine and all control devices R – Shall maintain the following records for five years: date and amounts of solvent that are added to the solvent cleaning machine, solvent compositions of wastes removed, and calculations sheet showing how the monthly emissions and the rolling 3-month average emissions of TCE were determined. R – Determine facility potential to emit from all solvent cleaning operations using procedures in Section 63.465(E) of Subpart T Rp – Submit initial statement of compliance to agency no later than 150 days following startup of unit.



DRAFT

**Division of Air Pollution Control
Title V Permit
for
W S TYLER**

Facility ID:	0243081244
Permit Number:	P0116191
Permit Type:	Initial
Issued:	2/25/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
W S TYLER

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Draft Title V Permit
W S TYLER
Permit Number: P0116191
Facility ID: 0243081244

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0243081244
Facility Description: Manufacturer of metal test sieves for particle sizing.
Application Number(s): A0047526
Permit Number: P0116191
Permit Description: Initial Title V permit for WS Tyler, a manufacturer of test sieves. Emissions units include a halogenated solvent vapor degreaser and spray booth.
Permit Type: Initial
Issue Date: 2/25/2014
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number:

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

W S TYLER
8570 TYLER BLVD
Mentor, OH 44060

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northeast District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Title V Permit
W S TYLER
Permit Number: P0116191
Facility ID: 0243081244
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))



- c) The permittee shall submit required reports in the following manner:
- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the



probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northeast District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northeast District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally



enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northeast District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))



4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.



- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))



10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible



Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.
 - b. The permittee's current compliance status.



- c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northeast District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northeast District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))



16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)



19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

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

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

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

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:



- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

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

25. Records Retention Requirements Under State Law Only

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

26. Inspections and Information Requests

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



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

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

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

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northeast District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



30. Submitting Documents Required by this Permit

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 Ohio EPA DAPC, Northeast District Office, 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 Responsible Official may be represented as provided through procedures established in Air Services.



Draft Title V Permit

W S TYLER

Permit Number: P0116191

Facility ID: 0243081244

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Title V Permit

W S TYLER

Permit Number: P0116191

Facility ID: 0243081244

Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.



Draft Title V Permit
W S TYLER
Permit Number: P0116191
Facility ID: 0243081244
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. K001, Devilbiss Dry Filter Paint Booth

Operations, Property and/or Equipment Description:

Devilbiss Dry Filter Paint Booth. 10 x 10 Paint Booth. Cup Air Gun. Lacquer Coating of Small Parts in a Paint Booth.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) c)(2) and d)(5).
- 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 22.2 pounds per day from coatings, and 4.55 tons per year, including both coatings and cleanup materials.</p> <p>Particulate emissions (PE) shall not exceed 0.551 pound per hour and 2.4 tons per year from coatings.</p> <p>See c).</p> <p>The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(2), OAC rule 3745-17-11(B)(1) and OAC rule 3745-17-07(A)(1).</p>
b.	OAC rule 3745-21-09(U)(2)(e)(ii)	See b)(2)a.
c.	OAC rule 3745-17-11(B)(1)	The requirements established pursuant to this rule are equivalent to the short term particulate emission limitation included in OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)(1)	See b)(2)b.



(2) Additional Terms and Conditions

- a. The permittee shall not use more than 3 gallons of coating material per day for the coating of miscellaneous metal parts.
- b. Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for control of particulate emissions whenever this emissions unit is in operation.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI P0116180]

- (2) Prior to the use of any coating in this coating line, the permittee shall determine that the coating meets the toxic screening criteria described below.

Purpose: The purpose of this test is to evaluate coatings to determine if the chemical compounds in the coatings would be emitted at acceptable levels for the general permit.

Data Needed: (1) MSDS sheet for each coating to be evaluated. (2) Information on the maximum coating usage rate for the line as discussed in Step 1 below.

Step 1. Using the following factors, calculate the maximum coating usage rate in terms of gallons per hour:

- a. Assume the coating line operates at its maximum speed while still making usable product.
- b. Assume the coating line is operating at its largest coating laydown rate. This would typically be accomplished by assuming the coating line is painting the largest part available.

Step 2. Review the material safety data sheet (MSDS) for the coating. Note each chemical compound listed, its TLV and the percent by weight of the chemical compound in the coating.

Step 3. Determine if any of the chemical compounds listed in the MSDS are also listed in the following table. If any of the chemical compounds are listed in the table, then calculate the maximum annual emission of that compound by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. Then multiply the result by 8760 hours per year. The result will be in pounds per year.

Check to see if the calculated emission rate is less than the allowable emission rate found in the below table. If all of the compounds emitted have a maximum annual emission of less than the allowed rate, then move on to step 4. If any of the compounds are emitted at a rate higher than the allowed emission rate, then contact your appropriate District Office or local air agency contact to determine if you can use the coating.



Chemical Compound	CAS	Molecular Weight (MW)	Allowed Emission Rate (lb/year)
arsenic compounds, as As	7440-38-2	74.92	1.70
benzene	71-43-2	78.11	1100
benzidine	92-87-5	184.23	5.60
benzo(a)pyrene	50-32-8	252.30	6.90
beryllium (and Be compounds)	7440-41-7	9.01	0.350
Cadmium	7440-43-9	112.4	5.20
Chromium	7440-47-3	varies	0.690
Hexachlorobenzene (HCB)	118-74-1	289.78	35.0
mercury (and Hg compounds)	7439-97-6	200.59	0.1
nickel (Ni subsulfide)	12035-72-2	240.19	17.0
Polychlorinateddibenzo-p-dioxins	1746-01-6	varies	0.030
Polychlorinateddibenzofurans	132-64-9	varies	0.030
polychlorinated biphenyls (PCBs, arcolors)	1336-36-3	varies	87.0
vinyl chloride	75-01-4	62.50	2000

Step 4. Find all of the chemical compounds in the coating that have a listed American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Value (TLV). For each chemical compound with a listed TLV (other than those in the above table), calculate the maximum short-term emission rate by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. The result should be in terms of pounds of the chemical compound per hour.

Step 5. Determine if the compound will be emitted at or below the acceptable rate. This is done by searching the following table for the chemical compound's TLV and then determining the maximum allowed emission rate listed in the below table. (Note. If the TLV is listed as ppm, then convert the TLV to $\mu\text{g}/\text{m}^3$ by using the following formula: $(\text{TLV in ppm}) \times (\text{MW}) \times (1000) / 24.45 = \text{TLV in } \mu\text{g}/\text{m}^3$; where MW is the molecular weight of the compound.) This table lists the allowable emission rates for compounds with a TLV between the high range and low range. Compare the maximum calculated short-term emission rate of each chemical compound to the allowed emission rate in the table. If the maximum emission rate is less than the allowed emission rate, then the chemical compound is emitted at an acceptable rate.

TLV Range ($\mu\text{g}/\text{m}^3$) (The TLV must be less than the high value listed and greater than or equal to the low value listed)		Allowed Emission Rate (lb/hr)
15	1	0.000067
30	15	0.0010
60	30	0.0020
120	60	0.0040
240	120	0.0080



Effective Date: To be entered upon final issuance

480	240	0.0160
960	480	0.0320
1,920	960	0.0640
3,840	1,920	0.128
7,680	3,840	0.256
15,360	7,680	0.512
30,720	15,360	1.02
61,440	30,720	2.05
122,880	61,440	4.10
245,760	122,880	8.19
491,520	245,760	16.4
983,040	491,520	32.8
1,966,080	983,040	65.5
3,932,160	1,966,080	131

Step 6. Check each chemical compound that has a listed TLV. If all compounds are emitted at a rate less than the allowed emission rate, then the coating passes the toxic screening test and can be used under this permit. If one or more of the chemical compounds are emitted at a rate greater than the allowed emission rate, then you should contact your appropriate District Office or local air agency contact to determine if you can use the coating.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI P0116180]

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.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0116180]

- (2) The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the VOC 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 emissions from all the coatings employed, in pounds [i.e., the sum of d)(2)b times d)(2)c for each coating employed].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0116180]



- (3) 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 amount of VOC 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 number of gallons of each cleanup material recovered;
 - f. the total amount of VOC from all cleanup materials recovered, in pounds [i.e., sum of d)(3)e times d)(3)c for each cleanup material recovered]; and
 - g. the total monthly VOC emissions from cleanup operations, in pounds [i.e., d)(3)d – d)(3)f].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0116180]

- (4) The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the daily VOC 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)].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0116180]

- (5) The permittee shall collect and record the results of any toxic screening evaluations performed in accordance with the requirement in c)(2).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0116180]

e) Reporting Requirements

- (1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the event occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0116180]

- (2) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 3 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or Local air agency) within 30 days after the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0116180]



- (3) The permittee shall submit quarterly deviation reports that identify each day the VOC emissions exceeded the daily emissions limit specified above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the Standard Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0116180]

- (4) The permittee shall submit annual compliance reports that include:
- a. a list of all allowable emissions limits and operational restrictions in b)(1), b)(2) and c); and
 - b. a statement whether the emissions unit is in compliance with the requirements listed.

The report shall be submitted to the Director (the appropriate District Office or local air agency) by February 1 of each year and shall cover the previous calendar year.

Annual Compliance Certification reports submitted according to the requirements of the Title V program are sufficient to meet this requirement.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0116180]

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. Emission Limitation:

The permittee shall not use more than 3 gallons of coating material per day for the coating of miscellaneous metal parts.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirement specified in d)(2)d.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0116180]

b. Emission Limitation:

VOC emissions shall not exceed 22.2 pounds per day from coatings.



Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirement specified in d)(2)e.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0116180]

c. Emission Limitation:

VOC emissions shall not exceed 4.55 tons per year, including both coatings and cleanup materials.

Applicable Compliance Method:

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0116180]

d. Emission Limitation:

PE shall not exceed 0.551 pound per hour from coatings.

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

$E = \text{maximum coating solids usage rate, in pounds per hour,} \times (1-TE) \times (1-CE)$

where:

$E = \text{PE rate (lbs/hr);}$

$TE = \text{fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55);}$
and

$CE = \text{fractional control efficiency of the control equipment (0.99).}$

If required by the Ohio EPA, the permittee shall demonstrate compliance with the above emission limitation by performing an emission test in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0116180]

e. Emission Limitation:

PE shall not exceed 2.4 tons per year from coatings.



Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.551 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0116180]

f. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required by the Ohio EPA, compliance with the above visible emission limitation shall be demonstrated by performing visible particulate emission observations in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0116180]

- (2) 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 VOC contents of the coatings. If, pursuant to section 11.4 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.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0116180]

g) **Miscellaneous Requirements**

- (1) None.



2. L002, L002

Operations, Property and/or Equipment Description:

Open Top Vapor Degreaser (a batch cleaning machine per Subpart T) using trichloroethylene solvent.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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), as effective 11/30/01.	Volatile organic compound (VOC) emissions shall not exceed 6.21 tons per year. See b)(2)a and b)(2)f.
b.	OAC rule 3745-31-05(A)(3), as effective 12/06/06.	See b)(2)g.
c.	40 CFR Part 63, Subpart T	150 kg TCE/square meter/month, as a 3-month rolling average. See b)(2)(b).
d.	OAC rule 3745-21-09(O)(3)	This emissions unit is exempt from the requirements of this rule provided the requirements of Subpart T are specified in an issued permit.

(2) Additional Terms and Conditions

a. The degreasing solvent employed in this batch cleaning machine is trichloroethylene. It is both a VOC and a hazardous air pollutant (HAP).

b. This emission limitation is established per Table 5 of Section 63.464, titled 'Alternative Standards', the compliance option chosen by the permittee to demonstrate compliance with Subpart T.



- c. The permittee shall ensure the solvent cleaning machine contains only clean liquid solvent on the first day of every month and is filled to the same fill-line. The monthly emissions shall be calculated using the records of all solvent additions, deletions, and recoveries from each month.
- d. The permittee shall maintain a log of solvent additions and deletions for the solvent cleaning machine.
- e. The permittee shall ensure that the monthly emissions of TCE from the solvent cleaning machine do not exceed the 3-month rolling average limit of 150 kilograms per square meter per month.
- f. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- g. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of VOC specified in b)(1)a from this air contaminant source since the controlled potentials to emit for the emissions of VOC are less than 10 tons per year.

- h. The 150 kg TCE/square meter/month is equivalent to 30.66 lbs TCE/square foot/month.

c) **Operational Restrictions**

- (1) On the first operating day of every month the permittee shall ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent, and used solvent that has been cleaned of soils. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill line each month, immediately prior to calculating monthly emissions and/or the overall cleaning system's control efficiency. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.



[40 CFR 63.465(b)]

[Authority for Term: OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart T and PTI P0109666]

d) **Monitoring and/or Recordkeeping Requirements**

(1) The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:

- a. owner's manuals, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment;
- b. records of the halogenated HAP, TCE solvent content for each solvent used in the solvent cleaning machine; and
- c. the date of installation for the solvent cleaning machine and all of its control devices.

[40 CFR 63.467(c)]

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart T and PTI P0109666]

(2) The permittee shall maintain the following records either in electronic or written form for a period of five years:

- a. the dates and amounts of solvent that are added to the solvent cleaning machine;
- b. the solvent composition of wastes removed from the cleaning machines using the procedures described in the "*Testing Requirements*" section of this permit; and
- c. calculation sheets showing how the monthly emissions and the rolling 3-month average emissions of TCE from the solvent cleaning machine were determined, as described in the "*Testing Requirements*" section of this permit, and the results of all calculations.

[40 CFR 63.467(c)]

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart T and PTI P0109666]

(3) The permittee shall determine the facility potential to emit from all solvent cleaning operations using the procedures in section 63.465(e) of Subpart T.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart T and PTI P0109666]



e) Reporting Requirements

(1) The permittee shall submit an initial statement of compliance to the regulating agency no later than 150 days following startup of the unit. The statement shall include the following information:

- a. the name and address of the permittee of the solvent cleaning machine;
- b. the address (i.e., physical location) of the solvent cleaning machine;
- c. the solvent/air interface area for the solvent cleaning machine; and
- d. the results of the first 3-month average of HAP emission calculations.

[40 CFR 63.468(e)]

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart T and PTI P0109666]

(2) The permittee shall submit an exceedance report on a semiannual basis, unless it is determined that more frequent reporting is necessary to accurately assess compliance or if an exceedance occurs. Once an exceedance has occurred, the permittee shall submit quarterly exceedance reports, until such time that the permittee requests and receives approval from the regulating agency of less frequent reporting requirements. The permittee may receive approval of less frequent reporting if the following conditions are met:

- a. the emissions unit has demonstrated a full year of compliance without an exceedance;
- b. the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions; and
- c. the regulating agency does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e)(3)(iii) of subpart A, 40 CFR 63.1, General Provisions.

[40 CFR 63.468(h)]

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart T and PTI P0109666]

(3) The permittee shall submit an annual solvent emission report by February 1 of each year, which shall cover the previous calendar year, and shall contain the following information:

- a. the size and type of the solvent cleaning machine, including if it has a solvent/air interface area or is using cleaning capacity;
- b. the average monthly solvent consumption for the solvent cleaning machine in kilograms per month; and



- c. the 3-month monthly rolling average HAP emission estimates, calculated each month using the method as described in the standard and/or the "*Testing Requirements*" section of this permit.

[40 CFR 63.468(f)]

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart T and PTI P0109666]

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. Emission Limitation:

Emissions of TCE shall not exceed 150 kg/m²/month as a 3-month rolling average.

Applicable Compliance Method:

Using the records of all solvent additions and deletions from the previous month, the permittee shall calculate emissions using the following equation:

$$E_i = (SA_i - LSR_i - SSR_i) / AREA_i$$

where:

E_i = the total halogenated HAP solvent emissions from the solvent cleaning machine during the most recent monthly reporting period i (kilograms of solvent per square meter of solvent/air interface are per month);

SA_i = the total amount of halogenated HAP liquid solvent added to the solvent cleaning machine during the most recent monthly reporting period i (kilograms of solvent per month);

LSR_i = the total amount of halogenated HAP liquid solvent removed the solvent cleaning machine during the most recent monthly reporting period i (kilograms of solvent per month);

* SSR_i = the total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine in solid waste, during the most recent monthly reporting period i (kilograms of solvent per month); and

$AREA_i$ = the solvent /air interface area of the solvent cleaning machine (square meters).

*The permittee shall determine SSR_i from tests conducted using reference method 25d or from engineering calculations included in the compliance report.



The permittee shall determine the monthly rolling average, EA, for the 3-month period ending with the most recent month's reporting period using the following equation:

$$EA_i = (\sum E_j) / 3, \text{ where the summation is from } j=1 \text{ to } j=3$$

where:

EA_i = the average halogenated HAP solvent emissions over the preceding 3 monthly reporting periods (kilograms of solvent per square meter of solvent/air interface area per month);

E_j = halogenated HAP solvent emissions for each month (j) for the most recent 3 monthly reporting periods (kilograms of solvent per square meter of solvent/air interface area per month);

$j=1$ = the most recent monthly reporting period;

$j=2$ = the monthly reporting period immediately prior to $j=1$; and

$j=3$ = the monthly reporting period immediately prior to $j=2$.

[40 CFR 63.465(c)]

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart T and PTI P0109666]

b. Emission Limitation:

VOC emissions shall not exceed 6.21 tons per year.

Applicable Compliance Method:

To determine the annual VOC emission rate, the following equation shall be used:

$$E = (L_s - L_w) \times D / 2,000 \text{ lbs}$$

where:

E = VOC emission rate in tons per year;

L_s = liquid volume of cleaning solvent employed each year (gallons);

L_w = liquid volume of cleaning solvent sent off-site as waste (gallons); and

D = density of cleaning solvent (pounds/gallon).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0109666]



Draft Title V Permit

W S TYLER

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g) Miscellaneous Requirements

(1) None.