



4/24/2014

Certified Mail

Mr. William Cowden
 Bi-Con Services
 10901 Clay Pike Road
 Derwent, OH 43733

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
 Facility ID: 0630005005
 Permit Number: P0116174
 Permit Type: Initial Installation
 County: Guernsey

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
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 (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. 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 PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)3858501 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: U.S. EPA
Ohio EPA-SEDO; Pennsylvania; West Virginia



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Bi-Con Services**

Facility ID:	0630005005
Permit Number:	P0116174
Permit Type:	Initial Installation
Issued:	4/24/2014
Effective:	4/24/2014



Division of Air Pollution Control
Permit-to-Install
for
Bi-Con Services

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. Federally Enforceable Standard Terms and Conditions	4
2. Severability Clause	4
3. General Requirements	4
4. Monitoring and Related Record Keeping and Reporting Requirements.....	5
5. Scheduled Maintenance/Malfunction Reporting	6
6. Compliance Requirements	6
7. Best Available Technology	7
8. Air Pollution Nuisance	8
9. Reporting Requirements	8
10. Applicability	8
11. Construction of New Sources(s) and Authorization to Install	8
12. Permit-To-Operate Application	9
13. Construction Compliance Certification	10
14. Public Disclosure	10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	10
16. Fees.....	10
17. Permit Transfers	10
18. Risk Management Plans	10
19. Title IV Provisions	10
B. Facility-Wide Terms and Conditions.....	11
C. Emissions Unit Terms and Conditions	13
1. P001, Blasting Booth.....	14
2. R001, Paint Booth #1	19
3. R002, Paint Booth #2.....	29



Final Permit-to-Install
Bi-Con Services
Permit Number: P0116174
Facility ID: 0630005005
Effective Date: 4/24/2014

Authorization

Facility ID: 0630005005
Facility Description:
Application Number(s): A0043926, A0047052, A0049282
Permit Number: P0116174
Permit Description: Initial installation permit for grit blasting booth P001 and paint booths R001 and R002 subject to 40 CFR Part 63, Subpart Mmmm.
Permit Type: Initial Installation
Permit Fee: \$1,000.00
Issue Date: 4/24/2014
Effective Date: 4/24/2014

This document constitutes issuance to:

Bi-Con Services
10901 Clay Pike Road
Derwent, OH 43733

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

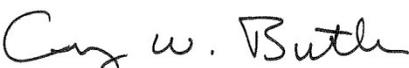
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0116174
Permit Description: Initial installation permit for grit blasting booth P001 and paint booths R001 and R002 subject to 40 CFR Part 63, Subpart M.

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

Emissions Unit ID:	P001
Company Equipment ID:	Blasting Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R001
Company Equipment ID:	Paint Booth 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R002
Company Equipment ID:	Paint Booth 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Bi-Con Services
Permit Number: P0116174
Facility ID: 0630005005
Effective Date: 4/24/2014

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.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 re-issuance, or modification.



- 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.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. 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 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.

4. 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, 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.
- 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, 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. 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 are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) 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 appropriate Ohio EPA District Office or contracted



local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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 ORC section 3704.08.
 - (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, Southeast 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.



8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southeast District Office. 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.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the



Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.



13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

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.

16. 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. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

19. 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.



Final Permit-to-Install
Bi-Con Services
Permit Number: P0116174
Facility ID: 0630005005
Effective Date: 4/24/2014

B. Facility-Wide Terms and Conditions



Final Permit-to-Install
Bi-Con Services
Permit Number: P0116174
Facility ID: 0630005005
Effective Date:4/24/2014

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart Mmmm: R001 and R002. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.



Final Permit-to-Install
Bi-Con Services
Permit Number: P0116174
Facility ID: 0630005005
Effective Date: 4/24/2014

C. Emissions Unit Terms and Conditions



1. P001, Blasting Booth

Operations, Property and/or Equipment Description:

Grit blasting booth with a maximum abrasive material throughput of 740 lbs/hr controlled with a dust collector with 100% capture and 99.9% control. Installed 11/1/2012.

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 11/30/2001	Install a baghouse or equivalent particulate emissions (PE) control technology that shall be designed to have at least 100% capture efficiency and 99.9% control efficiency. See b)(2)a. below.
b.	OAC rule 3745-31-05(C), as effective 12/1/2006	See b)(2)b. below.
c.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-17-11(B)(1)	PE shall not exceed 4.0 pounds per hour.

(2) Additional Terms and Conditions

a. 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.

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

Permit to Install P0116174 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. Operate a baghouse or equivalent PE control technology that shall have at least 100% capture efficiency and 99.9% control efficiency; and
- ii. PE shall not exceed 2.24 tons per year.

c) **Operational Restrictions**

- (1) The permittee shall install and operate a baghouse for the control of PE whenever this emissions unit is in operation and shall maintain the baghouse in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the baghouse is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual(s), with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

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

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended.



The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the baghouse, along with the documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (3) The permittee shall conduct periodic inspections of the baghouse to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to Ohio EPA upon request.
- (4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the baghouse and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (5) The permittee shall document each inspection (periodic and annual) of the baghouse and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

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



e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

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

a. Design Efficiency:

Install a baghouse or equivalent PE control technology that shall be designed to have at least 100% capture efficiency and 99.9% control efficiency.

Applicable Compliance Method:

Compliance is demonstrated by the manufacturer's design efficiency of a design capture efficiency of 100% and a design control efficiency of 99.9%.

b. Emissions Limitation:

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

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

c. Emissions Limitation:

PE shall not exceed 4.0 pounds per hour.

Applicable Compliance Method:

This emissions limitation was established using Curve P-2 of Figure 2 of the appendix to OAC rule 3745-17-11, and an uncontrolled mass rate of emissions (U) of 19.98 lb/hr.

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", and the procedures specified in OAC rule 3745 17 03(B)(10). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.



d. Emissions Limitations:

Permit to Install P0116174 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):

- i. Operate a baghouse or equivalent PE control technology that shall have at least 100% capture efficiency and 99.9% control efficiency; and
- ii. PE shall not exceed 2.24 tons per year.

Applicable Compliance Method:

The voluntary annual emissions limitation restriction was determined based on AP 42 Table 13.2.6-1: Emissions factor of 0.69 lb PE/1,000 lbs abrasive used (using filter) and the following calculations:

$$\frac{0.69 \text{ lbPE}}{1,000 \text{ lbabrasive}} * \frac{740 \text{ lbabrasive}}{\text{hr}} = 0.5106 \frac{\text{lb}}{\text{hr}} \text{Controlled}$$

$$\frac{0.5106 \text{ lb}}{\text{hr}} * \frac{8,760 \text{ hr}}{\text{yr}} * \frac{\text{ton}}{2,000 \text{ lbs}} = 2.24 \frac{\text{tons}}{\text{yr}} \text{Controlled}$$

Where:

740 lb/hr = maximum throughput (as submitted in permittee's application)

g) Miscellaneous Requirements

- (1) None.



2. R001, Paint Booth #1

Operations, Property and/or Equipment Description:

Paint booth #1 with Binks Manual Air Type Spray 2-Gun (Air Assisted) used for the coating of miscellaneous metal parts with a maximum coating usage of 18.0 gallons per hour and 31,536 gallons per year (based on a 5 hour cycle time); Controlled with a dry particulate filter with 100% capture and 99.9% control.

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)	Particulate emissions (PE) shall not exceed 0.079 pound per hour and 0.038 ton per year. There shall be no visible PE from any stack serving this emissions unit. Volatile organic compound (VOC) emissions from coatings shall not exceed 62.82lb/hr. VOC emissions from coating and cleanup shall not exceed 49.82 TPY. Compliance with this rule includes compliance with OAC rule 3745-21-09(U)(1), OAC rule 3745-17-11(C), and 40 CFR Part 63, Subpart Mmmm.
b.	40 CFR Part 63, Subpart Mmmm (40 CFR 63.3880 – 63.3981) [In accordance with 40 CFR 60.3881(b), this emissions unit is an existing affected source, as defined in 63.3882, that used 250 gallons per year, or more, of coatings that	For each existing general use coating affected source, limit HAP emissions to no more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period. See b)(2)a. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	contain HAPs in the surface coating of miscellaneous metal parts and products defined in paragraph (a) of this rule, and that is a major source or part of a major source of HAP emissions.]	(63.3890(b)(1))
c.	40 CFR 63.1-15 (40 CFR 60.7760)	Table 2 to Subpart M MMM of 40 CFR Part 63 – Applicability of General Provisions to Subpart M MMM of Part 63 shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
d.	OAC rule 3745-21-09(U)(1)	Coating employed in this emissions unit shall not exceed 3.0 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents.
e.	OAC rule 3745-17-11(C)	See c)(2)-(3), d)(5)-(9) and e)(2) below.
f.	OAC rule 3745-17-07(A)(1)	Exempt. See b)(2)b. below.

(2) Additional Terms and Conditions

- a. The permittee shall comply with all the applicable restrictions required under 40 CFR Part 63, Subpart M MMM, including the following sections:

63.3882(a)	Applicability
63.3882(b)	Equipment covered by Subpart M MMM
63.3882(b)	This facility is an existing source
63.3883(b)	Compliance date is 3 years after 1/2/2004
63.3891(a)	Compliant material option
63.3893(a)	No work practice standards

- b. Pursuant to OAC rule 3745-17-07(A)(3)(h), the visible PE limitations in OAC rule 3745-17-07(A)(1) do not apply to a source that is not subject to a mass emission limitation in OAC rule 3745-17-11.



c) Operational Restrictions

- (1) The permittee shall comply with all the applicable restrictions required under 40 CFR Part 63, Subpart M, including the following sections:

63.3892(a)	No applicable operating limits for compliant coatings
63.3900(b)	Operate affected source according to 63.6(e)(1)(i)

- (2) The permittee shall operate the 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.
- (3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with all the applicable recordkeeping requirements under 40 CFR Part 63, Subpart M, including the following sections:

63.3930(a)	Copy of all notification and reports
63.3930(b)	Current copy of MSDS or test data
63.3930(c)(1)	Compliance option time periods
63.3930(c)(2)	Calculation of organic HAP content for each coating
63.3930(d)	Name and volume of coating, thinner, and/or additive, and cleaning material
63.3930(e)	Mass fraction of organic HAP
63.3930(f)	Volume fraction of solids
63.3930(j)	Deviations
63.3931(a)	Records in suitable form
63.3931(b)	Keep records for 5 years



63.3931(c)	Keep records on-site for 2 years
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- (2) The permittee, having chosen to demonstrate compliance by means of a daily volume-weighted average VOC content, shall collect and record the following information each day for the coating line:
- a. the name and identification number of each coating and cleanup, as applied;
 - b. the mass of VOC per volume of coating (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
 - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$, as follows:

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

where:

$(C_{VOC,2})_A$ is the daily volume-weighted average VOC content of all coatings, as applied.

$C_{VOC,2i}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

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

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

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

V_S = the volume fraction of solids 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.

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.

M_C = mass of coating employed during the time period "t", in pounds 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 is per day and not included in the calculation.

- (3) The permittee shall collect and record the following information each day for the coating operations:
- the name and identification number of each coating applied;
 - the VOC content of each coating as applied;
 - the number of gallons of each coating applied;
 - the daily VOC emissions from all the coatings applied, in pounds;
 - the total number of gallons of all coatings applied;
 - number of hours of operation;
 - the daily average pounds of VOC per hour.

The coatings VOC content and usage records shall be maintained for a minimum of 3 years.

- (4) The permittee shall collect and record the following information for each month for all cleanup material employed in this emissions unit:
- The name and identification of each cleanup material;
 - The VOC content, as applied, in pounds per gallon for each cleanup material;
 - The amount of each cleanup material employed, in gallons;



- d. The monthly VOC emissions, as applied, from cleanup material, in pounds,
- 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 tons.

* 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.

- (5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (6) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:



- a. the date of the inspection;
- b. a description of each/any problem identified and the date it was corrected;
- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

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

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

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall comply with all the applicable notification requirements under 40 CFR Part 63, Subpart M, including the following sections:

63.3883(d)	Requirement to submit notifications
63.3910(a)	General
63.3910(b)	Initial notification
63.3910(c)(1)-(11)	Notification of compliance status
63.3920(a)(1)-(7)	Semi-annual reports
63.3920(b)	Performance test reports
63.3920(c)(1)-(2)	Startup, shutdown, malfunction reports

- (3) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (4) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.



- (5) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing that the 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.

f) Testing Requirements

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

a. Emissions Limitations:

PE shall not exceed 0.079 pound per hour and 0.038 ton per year.

Applicable Compliance Method:

Compliance with the short-term PE limitation shall be demonstrated based on the following calculation:

$E = (\text{maximum coating solids content}) \times (\text{maximum usage rate, in gallons (18.0 gallons)}) \times (1-TE) \times (1-CE)$

Where E= PE rate (lbs/hr);

TE = 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 (0.65); and

CE = fractional control efficiency of the control equipment (0.999).

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" , and the procedures specified in OAC rule 3745 17 03(B)(10). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the annual PE limitation shall be demonstrated based on the following calculation:

$E = (\text{maximum coating solids content}) \times (\text{maximum usage rate, in gallons (18.0 gallons)}) \times (1-TE) \times (1-CE) \times (8,760 \text{ hrs/yr}) / (2,000 \text{ lbs/ton})$

Where E= PE rate (lbs/hr);

TE = 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 (0.65); and



CE = fractional control efficiency of the control equipment (0.999).

b. Emissions Limitation:

There shall be no visible PE from any stack serving this emissions unit.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 22.

c. Emissions Limitation:

VOC emissions from coatings shall not exceed 62.82 lb/hr.

Applicable Compliance Method:

Compliance with the short-term VOC limitation shall be demonstrated based on the recordkeeping in d)(3) above.

This emissions limitation was established based upon the following calculation:

(maximum VOC content (lb/gal)) * (maximum coating use in gallons/hour (18.0))

$$\frac{3.49 \text{ lbs}}{\text{gal}} * \frac{18 \text{ gal}}{\text{hr}} = 62.82 \frac{\text{lbs}}{\text{hr}} \text{Uncontrolled}$$

If required, organic compound emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

d. Emissions Limitation:

VOC emissions from coating and cleanup shall not exceed 49.82 TPY.

Applicable Compliance Method:

Compliance with the annual VOC limitation shall be demonstrated based on a summation of the daily VOC emission from coating, as recorded in d)(3) and the monthly VOC emissions from cleanup, as recorded in d)(4).

This emissions limitation was established based upon the following calculation using a daily weighted VOC content not to exceed 3.0 lb/gal in accordance with OAC rule 3745-21-09:



$$\left[\left(\frac{3.0 \text{ lbs}}{\text{galcoating}} * \frac{31,536 \text{ gal}}{\text{yr}} \right) + \left(\frac{6.9 \text{ lb}}{\text{galcleanup}} * \frac{730 \text{ gal}}{\text{year}} \right) \right] * \frac{\text{ton}}{2,000 \text{ lbs}} = 49.82 \frac{\text{tons}}{\text{yr}}$$

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

e. Emissions Limitation:

For each existing general use coating affected source, limit HAP emissions to no more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

Applicable Compliance Method:

Compliance shall be determined in accordance to 40 CFR Part 63.3941(a)-(e).

f. Emissions Limitation:

Coatings employed shall not exceed 3.0 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

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

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

g) Miscellaneous Requirements

- (1) None.



3. R002, Paint Booth #2

Operations, Property and/or Equipment Description:

Paint Booth #2 using Titan Speeflo Hydro Pro IV - Airless (1-gun) used for the coating of miscellaneous metal parts with a maximum coating usage of 18.75 gallons per hour and 32,850 gallons per year (based on a 5 hour cycle time); Controlled with a dry particulate filter with 100% capture and 99.9% control.

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)	Particulate emissions (PE) shall not exceed 0.082 pound per hour and 0.040 ton per year. There shall be no visible PE from any stack serving this emissions unit. Volatile organic compound (VOC) emissions from coatings shall not exceed 65.44lbs/hr. VOC emissions from coating and cleanup shall not exceed 51.79 TPY. Compliance with this rule includes compliance with OAC rule 3745-21-09(U)(1), OAC rule 3745-17-11(C), and 40 CFR Part 63, Subpart Mmmm.
b.	40 CFR Part 63, Subpart Mmmm (40 CFR 63.3880 – 63.3981) [In accordance with 40 CFR 60.3881(b), this emissions unit is an existing affected source, as defined in 63.3882, that used 250 gallons per year, or more, of coatings that	For each existing general use coating affected source, limit HAP emissions to no more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period. See b)(2)a. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	contain HAPs in the surface coating of miscellaneous metal parts and products defined in paragraph (a) of this rule, and that is a major source or part of a major source of HAP emissions.]	(63.3890(b)(1))
c.	40 CFR 63.1-15 (40 CFR 60.7760)	Table 2 to Subpart M of 40 CFR Part 63 – Applicability of General Provisions to Subpart M of Part 63 shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
d.	OAC rule 3745-21-09(U)(1)	Coating employed in this emissions unit shall not exceed 3.0 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents.
e.	OAC rule 3745-17-11(C)	See c)(2)-(3), d)(1)-(6) and e)(2) below.
f.	OAC rule 3745-17-07(A)(1)	Exempt. See b)(2)b. below.

(2) Additional Terms and Conditions

- a. The permittee shall comply with all the applicable restrictions required under 40 CFR Part 63, Subpart M, including the following sections:

63.3882(a)	Applicability
63.3882(b)	Equipment covered by Subpart M
63.3882(b)	This facility is an existing source
63.3883(b)	Compliance date is 3 years after 1/2/2004
63.3891(a)	Compliant material option
63.3893(a)	No work practice standards

- b. Pursuant to OAC rule 3745-17-07(A)(3)(h), the visible PE limitations in OAC rule 3745-17-07(A)(1) do not apply to a source that is not subject to a mass emission limitation in OAC rule 3745-17-11.



c) Operational Restrictions

- (1) The permittee shall comply with all the applicable restrictions required under 40 CFR Part 63, Subpart M, including the following sections:

63.3892(a)	No applicable operating limits for compliant coatings
63.3900(b)	Operate affected source according to 63.6(e)(1)(i)

- (2) The permittee shall operate the 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.
- (3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with all the applicable recordkeeping requirements under 40 CFR Part 63, Subpart M, including the following sections:

63.3930(a)	Copy of all notification and reports
63.3930(b)	Current copy of MSDS or test data
63.3930(c)(1)	Compliance option time periods
63.3930(c)(2)	Calculation of organic HAP content for each coating
63.3930(d)	Name and volume of coating, thinner, and/or additive, and cleaning material
63.3930(e)	Mass fraction of organic HAP
63.3930(f)	Volume fraction of solids
63.3930(j)	Deviations
63.3931(a)	Records in suitable form
63.3931(b)	Keep records for 5 years



63.3931(c)	Keep records on-site for 2 years
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(2) The permittee, having chosen to demonstrate compliance by means of a daily volume-weighted average VOC content, shall collect and record the following information each day for the coating line:

- a. the name and identification number of each coating and cleanup, as applied;
- b. the mass of VOC per volume of coating (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
- c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$, as follows:

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

where:

$(C_{VOC,2})_A$ is the daily volume-weighted average VOC content of all coatings, as applied.

$C_{VOC,2i}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

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

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

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

V_S = the volume fraction of solids 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.

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.

M_C = mass of coating employed during the time period "t", in pounds 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 is per day and not included in the calculation.

- (3) The permittee shall collect and record the following information each day for the coating operations:
- the name and identification number of each coating applied;
 - the VOC content of each coating as applied;
 - the number of gallons of each coating applied;
 - the daily VOC emissions from all the coatings applied, in pounds;
 - the total number of gallons of all coatings applied;
 - number of hours of operation;
 - the daily average pounds of VOC per hour.

The coatings VOC content and usage records shall be maintained for a minimum of 3 years.

- (4) The permittee shall collect and record the following information for each month for all cleanup material employed in this emissions unit:
- The name and identification of each cleanup material;
 - The VOC content, as applied, in pounds per gallon for each cleanup material;
 - The amount of each cleanup material employed, in gallons;



- d. The monthly VOC emissions, as applied, from cleanup material, in pounds,
- 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 operation.

* 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.

- (5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (6) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;



- b. a description of each/any problem identified and the date it was corrected;
- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

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

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

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall comply with all the applicable notification requirements under 40 CFR Part 63, Subpart M, including the following sections:

63.3883(d)	Requirement to submit notifications
63.3910(a)	General
63.3910(b)	Initial notification
63.3910(c)(1)-(11)	Notification of compliance status
63.3920(a)(1)-(7)	Semi-annual reports
63.3920(b)	Performance test reports
63.3920(c)(1)-(2)	Startup, shutdown, malfunction reports

- (3) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (4) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.



- (5) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing that the 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.

f) Testing Requirements

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

a. Emissions Limitations:

PE shall not exceed 0.079 pound per hour and 0.040 ton per year.

Applicable Compliance Method:

Compliance with the short-term PE limitation shall be demonstrated based on the following calculation:

$E = (\text{maximum coating solids content}) \times (\text{maximum usage rate, in gallons (18.75 gallons)}) \times (1-TE) \times (1-CE)$

Where E= PE rate (lbs/hr);

TE = 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 (0.65); and

CE = fractional control efficiency of the control equipment (0.999).

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" , and the procedures specified in OAC rule 3745 17 03(B)(10). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the annual PE limitation shall be demonstrated based on the following calculation:

$E = (\text{maximum coating solids content}) \times (\text{maximum usage rate, in gallons (18.75 gallons)}) \times (1-TE) \times (1-CE) \times (8,760 \text{ hrs/yr}) / (2,000 \text{ lbs/ton})$

Where E= PE rate (lbs/hr);

TE = 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 (0.65); and



CE = fractional control efficiency of the control equipment (0.999).

b. Emissions Limitation:

There shall be no visible PE from any stack serving this emissions unit.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 22.

c. Emissions Limitation:

VOC emissions from coatings shall not exceed 65.44 lbs/hr.

Applicable Compliance Method:

Compliance with the short-term VOC limitation shall be demonstrated based on the recordkeeping in d)(3) above.

This emissions limitation was established based upon the following calculation:

(maximum VOC content (lb/gal)) * (maximum coating use (gal/hr))

$$\frac{3.49 \text{ lb}}{\text{gal}} * \frac{18.75 \text{ gal}}{\text{hr}} = 65.44 \frac{\text{lbs}}{\text{hr}} \text{ Uncontrolled}$$

If required, organic compound emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

d. Emissions Limitation:

VOC emissions from coating and cleanup shall not exceed 51.79 TPY.

Applicable Compliance Method:

Compliance with the annual VOC limitation shall be demonstrated based on a summation of the daily VOC emission from coating, as recorded in d)(3) and the monthly VOC emissions from cleanup, as recorded in d)(4).

This emissions limitation was established using the following calculation:

$$\left[\left(\frac{3.0 \text{ lbs}}{\text{galcoating}} * \frac{32,850 \text{ gal}}{\text{yr}} \right) + \left(\frac{6.9 \text{ lb}}{\text{galcleanup}} * \frac{730 \text{ gal}}{\text{year}} \right) \right] * \frac{\text{ton}}{2,000 \text{ lbs}} = 51.79 \frac{\text{tons}}{\text{yr}}$$



Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

e. Emissions Limitation:

For each existing general use coating affected source, limit HAP emissions to no more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

Applicable Compliance Method:

Compliance shall be determined in accordance to 40 CFR Part 63.3941(a)-(e).

f. Emissions Limitation:

Coatings employed shall not exceed 3.0 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

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

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

g) Miscellaneous Requirements

(1) None.