State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
CUYAHOGA COUNTY

Street Address:
122 S. Front Street

Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 13-04435
Fac ID: 1318247914
DATE: 6/27/2006

Industrial Metal Finishing, Inc.
Douglas Whitaker
7680 Bond St
Glenwillow, OH 44139

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA **CLAA**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 6/27/2006**
Terms and Conditions **Effective Date: 6/27/2006**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 13-04435

Application Number:	13-04435
Facility ID:	1318247914
Permit Fee:	**$0**
Name of Facility:	Industrial Metal Finishing, Inc.
Person to Contact:	Douglas Whitaker
Address:	7680 Bond St Glenwillow, OH 44139

Location of proposed air contaminant source(s) [emissions unit(s)]:
7680 Bond St
Glenwillow, **Ohio**

Description of proposed emissions unit(s):
Mics. Metal parts coating line.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Joseph P. Koncelik

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. 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:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. 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 appropriate Ohio EPA District Office or local air agency. 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 B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency 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.

iv. If this permit is for an emissions unit located at a Title V facility, then 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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.

4. 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.

5. 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.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. 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.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any 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. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. 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:

i. 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.

ii. 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.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. 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 appropriate Ohio EPA District Office or local air agency 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:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. 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.

10. Permit-To-Operate Application

a. If 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 the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be <u>obtained before</u> the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. 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 appropriate Ohio EPA District Office or local air agency.

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 appropriate Ohio EPA District Office or local air agency. 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 (i.e., postmarked) 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.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder.

The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing 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 modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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 party shows good cause for any such extension.

5. Construction of New Sources(s)

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.

6. 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.

7. 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).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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 (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit-To-Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
Volatile Organic Compounds (VOC)	**4.64 tpy**
Particulate Emissions (PE)	**1.31 tpy**

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

I. Applicable Emissions Limitations and/or Control Requirements

1. The emissions of hazardous air pollutants (HAPs), as defined in Section 112(b) of Title III of the Clean Air Act, from all emissions units (non-insignificant and insignificant) at the facility, shall not exceed 9.9 TPY for any individual HAP, as a rolling, 12-month summation of the individual HAP emissions, and 24.9 TPY for any combination of HAPs, as a rolling, 12-month summation of the combined HAP emissions. The permittee has voluntarily accepted these restrictions on HAP emissions to avoid being classified as a major source of HAP and subject to federal Maximum Achievable Control Technology (MACT) standard for Surface Coating of Miscellaneous Metal Parts and Products.

   The permittee has existing records to demonstrate that HAP emissions have not exceeded HAP major source thresholds.

2. The annual compliance certification reports submitted in accordance with Part I of this permit shall include certification with the above-mentioned HAP emission limitations.

II. Operational Restrictions

1. The maximum annual individual HAP material usage for the facility (emissions units K001, K002, K003, L001, and N001) shall not exceed 9.9 tons, based upon a rolling 12-month summation of the individual HAP material usage figures.

   To ensure enforceability during the first twelve (12) calendar months of operation following the issuance of this permit, the actual individual HAP material usage records over the previous twelve (12) calendar months shall be used to determine the rolling, 12-month individual HAP material usage for the facility.

2. The maximum annual combined HAP material usage for the facility (emissions units K001, K002, K003, L001, and N001) shall not exceed 24.9 tons, based upon a rolling 12-month summation of the combined HAP material usage figures.

   To ensure enforceability during the first twelve (12) calendar months of operation following the issuance of this permit, the actual combined HAP material usage records

over the previous twelve (12) calendar months shall be used to determine the rolling, 12-month combined HAP material usage for the facility.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for all the emissions units (non-insignificant and insignificant) located at the facility (emissions units K001, K002, K003, L001, and N001):

   a. the name and identification number of each HAP containing material employed;

   b. the individual HAP content for each HAP, in pounds of individual HAP per pound of material;

   c. the total combined HAP content, in pounds of combined HAPs per pound of material [sum all the individual HAP contents from (b)];

   d. the number of pounds of each HAP containing material employed;

   e. for the degreaser (L001) the amount of solvent disposed per month, in pounds;

   f. for combustion sources the cu. ft. of natural gas purchases, each month;

   g. the emission factors for any HAP specified in the most recent edition of U.S. EPA publication AP -42, Chapters 1.3 and 1.4 for the combustion of natural gas;

   h. the total individual HAP emissions for the degreaser {(b) x[(d) — (e)]};

   i. the total individual HAP emissions from all HAP containing materials, in pounds or tons per month [for each HAP the sum of (b) times (d) for each material plus (h) for the degreaser];

   j. the total combined HAP emissions from all HAP containing materials, in pounds or tons per month [the sum of (c) times (d) for each material plus (h) for the degreaser];

   k. the total individual HAP emissions from all combustion sources, in pounds or tons per month [for each HAP the sum of (f) times (g) for each combustion source];

   l. the total combined HAP emissions from all combustion sources, in pounds or tons per month [the sum of (f) times (g) for each combustion source];

   m. the updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the

issuance of this permit, this shall be a cumulative total for all months since the issuance of the PTI; and

n. the updated rolling, 12-month summation of emissions for total combined HAPs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of this permit, this shall be a cumulative total for all months since the issuance of the PTI.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Cleveland Division of Air Quality (Cleveland DAQ) contact. This information does not have to be kept on an individual emission unit basis.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information for the facility (emissions units K001, K002, K003, L001, and N001):

   a. an identification of each month during which the rolling, 12-month individual HAP material usage exceeded 9.9 tons/yr based on a rolling, 12-month summation;

   b. an identification of each month during which the rolling, 12-month individual HAP emissions exceeded 9.9 tons/yr based on a rolling, 12-month summation;

   c. an identification of each month during which the rolling, 12-month combined HAP material usage exceeded 24.9 tons/yr based on a rolling, 12-month summation; and

   d. an identification of each month during which the rolling, 12-month combined HAP emissions exceed 24.9 tons/yr based on a rolling, 12-month summation;

   The deviation (excursion) report shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Part II Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

   a. Emission Limitation:
   9.9 tons individual HAP emissions per rolling, 12-month period for this facility (emissions units K001, K002, K003, L001, and N001)

   Applicable Compliance Method:
   Compliance shall be determined based on the recordkeeping specified in Part II

Section A. III.

b. Emission Limitation:
24.9 tons combined HAP emissions per rolling, 12-month period for this facility(emissions units K001, K002, K003, L001, and N001)

Applicable Compliance Method:
Compliance shall be determined based on the recordkeeping specified in Part II Section A. III.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment		Applicable Rules/Requirements
K003 - Misc. metal parts process line. Line consists of a conveyor system with a liquid spray booth (electrostatic and HLVP spray guns, forced air exhaust, and fabric filters); a powder coat spray booth (air-powered spray gun, cyclone reclaim collection, and fabric filters); and a cure oven (typical operating temperature range between 342 - 450° F for powder coatings and a maximum of 262° F for liquid coatings).		OAC rule 3745-31-05 (A) (3)
Modified		OAC rule 3745-21-09 (U)(2)(e)(ii)
Terms in this permit supercede those identified in PTI #13-03549 issued 04/07/99.		OAC rule 3745-17-07 (A)(1)

OAC rule 3745-17-11 (B)(1)	Applicable Emissions <u>Limitations/Control Measures</u>	See Part II.
OAC rule 3745-31-05(C) Synthetic Minor to avoid MACT (40 CFR Part 63 Subpart MMMM)	25.42 lbs/day and 4.64 tpy of Volatile Organic Compound (VOC) emissions from all coatings, thinners, and clean-up materials. 7.2 lbs/day and 1.31 tpy of Particulate Emissions (PE). See Section II.1. and II.2. The requirements of this rule also include compliance with the requirements of OAC rule(s) 3745-21-09 (U)(2)(e); 3745-17-07(A); and 3745-31-05(C). The permittee shall not use more than 3 gallons of coating material per day for the coating of miscellaneous metal parts in this emissions unit. Visible PE shall not exceed 20 percent opacity from any stack serving this emission unit, as a six-minute average, except as provided by rule. The particulate emission limitation specified in this rule is less stringent than the limitation specified in OAC rule 3745-31-05(A)(3).	

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

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

2. The permittee shall not use more than 3 gallons of coating material per day for the coating of miscellaneous metal parts in the liquid booth portion of this emissions unit. The powder coating booth associated with this emissions unit is not subject to the usage restriction found in OAC rule 3745-21-09 (U)(2)(e)(ii).

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the liquid booth associated with this emissions unit:

   a. the name and identification number of each coating and clean-up material employed;

   b. the number of gallons of each coating employed;

   c. the number of gallons of each virgin cleanup material employed;

   d. the VOC content of each coating employed, as applied, in pounds per gallon;

   e. the VOC content of each virgin clean-up material employed, in pounds per gallon;

   f. the amount of waste clean-up material disposed of, in gallons;

   g. the total daily VOC emissions generated from all coating employed calculated by summing the records of [(1.b) x (1.d)] for each coating , in pounds per day;

   h. the total daily VOC emissions generated from all clean-up materials employed [(c-f)*e]; and

   i. the total daily VOC emissions from all coatings, thinners and clean-up materials

[(1.g)+(1.h)].

2. 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.

3. The permittee shall perform monthly 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 emission incident; and

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

IV. Reporting Requirements

1. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 3 gallons per day. The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days after the end of the calender month during which the exceedance occurs and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

2. The permittee shall notify the Cleveland DAQ of any daily record showing the exceedance of the daily VOC emission limitation for this emissions unit. A copy of such record shall be sent to the Cleveland DAQ within 30 days after the end of the calender month during which the exceedance occurs and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

3. The permittee shall submit annual reports to the Cleveland DAQ which summarize the annual emissions of VOC from this emissions unit. The reports shall be submitted by February 1 of each year and shall cover the previous calendar year and shall include a

copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

4. The permittee shall notify the Cleveland DAQ 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 Cleveland DAQ within 30 days after the end of the calender month during which the exceedance occurs and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

5. The permittee shall submit semiannual written reports which (a) identify each month during which any visible particulate emissions were observed from the stack serving this emission unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Cleveland DAQ by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

   a. Emissions Limitation:
   25.42 lbs/day of VOC emissions

   Applicable Compliance Method:
   Compliance shall based upon the record keeping specified in Section A.III.1.

   b. Emissions Limitation:
   4.64 tpy of VOC emissions

   Applicable Compliance Method:
   Compliance shall based upon the record keeping specified in Section A.III.1 and shall be the sum of the daily emission rates for the calendar year.

   c. Emission Limitation:
   7.2 lbs/day of PE

Emissions Unit ID: **K003**

Applicable Compliance Method:
If required, compliance with the above emission limitation shall be determined by using the following equations:

PE (lb/day) = sum of [SC * UR * (1 - TE) * (1 - CE)] for each booth

where:

1) PE = Particulate Emissions Rate (lbs/day);
2) SC = Solids Content of Coating (lbs / gal or lbs / lb) derived by multiplying the Solids Content (% wt) by the density of each coating and averaging over all coatings used during that day;
3) UR = Usage Rate (gal / day or lbs / day) derived from the maximum coating used during a given day;
4) TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coating part to the amount of coating solids used (TE = 60% for both the liquid and powder booth per 40 CFR Part 60, Section 60.313 and operational practices)
5) CE = Control Efficiency, which is the fractional control efficiency of the various control equipment (CE = 90% for the liquid booth; and CE = 95% for the powder booth)

If required, the permittee shall demonstrate compliance in accordance with the procedures in 40 CFR Part 60, Appendix A, Method 5.

d. Emission Limitation:
1.31 TPY of PE

Applicable Compliance Method:
If required, compliance with the above emission limitation shall be determined by the sum of the daily emission rates for the calendar year divided by 2000.

e. Emission Limitation:
Visible particulate emissions shall not exceed 20 percent opacity from any stack, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in U.S. EPA Reference Method 9.

VI. Miscellaneous Requirements

1. This Permit to Install replaces PTI No.13-03549, issued April 07, 1999, for this emissions unit.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K003 - Misc. metal parts process line. Line consists of a conveyor system with a liquid spray booth (electrostatic and HLVP spray guns, forced air exhaust, and fabric filters); a powder coat spray booth (air-powered spray gun, cyclone reclaim collection, and fabric filters); and a cure oven (typical operating temperature range between 342 - 450° F for powder coatings and a maximum of 262° F for liquid coatings). Modified Terms in this permit supercede those identified in PTI #13-03549 issued 04/07/99.	Air Toxics	Air Toxics

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to a generic screening model for common pollutants emitted by this industry using the parameters outlined in the applicability criteria document for the Ohio Coatings General Permit and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Xylene (41.26% by weight of coating VOC content, as applied)
   TLV (ug/m3): 434360
   Maximum Hourly Emission Rate (lbs/hr): 7.68 (total coating VOC content, as applied)
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 344.67
   MAGLC (ug/m3): 10338

   Pollutant: Iso-Propyl Alcohol (41.97% by weight of coating VOC content, as applied)
   TLV (ug/m3): 491530
   Maximum Hourly Emission Rate (lbs/hr): 7.68 (total coating VOC content, as applied)
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350.60
   MAGLC (ug/m3): 11704

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

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

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack

diameter, etc.).

2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None