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

5/27/2014

Certified Mail

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

Mr. Bill Rankin
Waterford Tank & Fabrication Ltd
203 SR 83
Beverly, OH 45715

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0684005005
Permit Number: P0112553
Permit Type: Initial Installation
County: Washington

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-SEDO

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Waterford Tank & Fabrication Ltd

Facility ID:	0684005005
Permit Number:	P0112553
Permit Type:	Initial Installation
Issued:	5/27/2014
Effective:	5/27/2014
Expiration:	5/27/2019

Division of Air Pollution Control
Permit-to-Install and Operate
for
Waterford Tank & Fabrication Ltd

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Authorization

Facility ID:	0684005005
Application Number(s):	A0046487, A0049831, A0049858
Permit Number:	P0112553
Permit Description:	This permit serves as the initial installation FEPTIO for two paint booths, controlled by dry particulate filters, and two abrasive blasting units, each controlled by a baghouse. P001 and R001 are already installed. P002 and R002 are proposed.
Permit Type:	Initial Installation
Permit Fee:	$1,200.00
Issue Date:	5/27/2014
Effective Date:	5/27/2014
Expiration Date:	5/27/2019

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

This document constitutes issuance to:

Waterford Tank & Fabrication Ltd
203 State Rte 83
Beverly, OH 45715

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0112553
Permit Description: This permit serves as the initial installation FEPTIO for two paint booths, controlled by dry particulate filters, and two abrasive blasting units, each controlled by a baghouse. P001 and R001 are already installed. P002 and R002 are proposed.

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:	Abrasive Blasting Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	Abrasive Blasting Booth #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R001**
Company Equipment ID:	Paint Booth
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

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) 2.a)a., 3.a), 4.a), 4.b), 5.a)

2. Applicable Emissions Limitations and/or Control Requirements

   a) 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(D) (Synthetic minor to avoid Title V status)	Emissions of any single hazardous air pollutant (HAP) from coatings and cleanup material use at the facility shall not exceed 9.9 tons based on a rolling, 12-month summation. Total HAP emissions from coatings and cleanup material use at the facility shall not exceed 24.9 tons based on a rolling, 12-month summation.

3. Monitoring and/or Recordkeeping Requirements

   a) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed at the facility:

      (1) the name and identification of each coating and cleanup material employed;

      (2) the number of gallons of each coating applied;

      (3) the number of gallons of each cleanup material employed;

      (4) the individual HAP content for each coating and cleanup material, for each HAP, in pounds per gallon;

(5) total HAP content for each coating and cleanup material in pounds per gallon;

(6) the individual HAP emissions from all coatings and cleanup materials employed [the sum of (b. times f.), for each HAP in all coatings plus (c. times f.) for each HAP in all cleanup materials] divided by 2,000, in tons;

(7) the total HAP emissions from all coatings and cleanup materials employed [the sum of (b. times g.) for all coatings plus (c. times g.) for all cleanup materials] divided by 2,000, in tons;

(8) the rolling, 12-month summation of the individual HAP emissions, i.e., the summation of the individual HAP emissions, as recorded in "i" above, for the present month plus the previous 11 months of operation, in ton(s); and

(9) the rolling, 12-month summation of the total HAP emissions, i.e., the summation of the total HAP emissions, as recorded in "j" above, for the present month plus the previous 11 months of operation, in ton(s).

[Note: A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.]

4. Reporting Requirements

a) 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.

b) The permittee shall submit quarterly deviation (excursion) reports that identify:

(1) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

a. Facility wide emissions of any single HAP shall not exceed 9.9 tons based on a rolling, 12-month summation.

b. Facility wide total HAP emissions shall not exceed 24.9 tons based on a rolling, 12-month summation.

(2) the probable cause of each deviation (excursion);

(3) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

(4) the magnitude and duration of each deviation (excursion).

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

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

5. Testing Requirements

a) Compliance with the Emissions Limitations and/or Control Requirements specified in section 2. of these terms and conditions shall be determined in accordance with the following methods:

(1) Emissions Limitations:

Emissions of any single HAP from coatings and cleanup material use at the facility shall not exceed 9.9 tons based on a rolling, 12-month summation.

Total HAP emissions from coatings and cleanup material use at the facility shall not exceed 24.9 tons based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with these emissions limitations shall be demonstrated by the recordkeeping in 3.a).

6. Miscellaneous Requirements

a) All other emissions sources located at Waterford Tank & Fabrication Ltd have been evaluated and emit less than 0.99 tons per year of VOC emissions combined.

C. Emissions Unit Terms and Conditions

1. P001, Abrasive Blasting Booth #1

Operations, Property and/or Equipment Description:

Abrasive blasting booth #1 for fabricated metal parts and tanks and under negative pressure; controlled by a baghouse with 100% capture and rated at 0.02 gr/dscf (20,000 acfm) and venting back inside the enclosed building/booth. P001 was installed 9/14/2011.

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) and ORC 3704.03(T)	Install a baghouse that is designed to meet 0.02 gr/dscf.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (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.
c.	OAC rule 3745-17-11(B)(1)	PE shall not exceed 4.10 pounds per hour.

(2) Additional Terms and Conditions

a. None.

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 manufacture'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 PE 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) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

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

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

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

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 Limitation:

Install a baghouse that is designed to meet 0.02 gr/dscf.

Applicable Compliance Method:

If required, PE 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". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

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 PE shall be determined according to USEPA Method 9.

c. Emissions Limitation:

PE shall not exceed 4.10 pounds per hour.

Applicable Compliance Method:

This emissions limitation was established using Table 1 of the appendix to OAC rule 3745-17-11 using a process weight at maximum capacity of 2,000 pounds (1 ton).

If required, PE 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.

g) Miscellaneous Requirements

(1) None.

2. P002, Abrasive Blasting Booth #2

Operations, Property and/or Equipment Description:

Abrasive blasting booth #2 for fabricated metal parts and tanks and under negative pressure; controlled by a baghouse with 100% capture and rated at 0.02 gr/dscf (20,000 acfm) and venting back inside the enclosed building/booth.

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) and ORC 3704.03(T)	Install a baghouse that is designed to meet 0.02 gr/dscf.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (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.
c.	OAC rule 3745-17-11(B)(1)	PE shall not exceed 4.94 pounds per hour.

(2) Additional Terms and Conditions

a. None.

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 manufacture'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 PE 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) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

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

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

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

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 Limitation:

Install a baghouse that is designed to meet 0.02 gr/dscf.

Applicable Compliance Method:

If required, PE 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". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

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 PE shall be determined according to USEPA Method 9.

c. Emissions Limitation:

PE shall not exceed 4.94 pounds per hour.

Applicable Compliance Method:

This emissions limitation was established using Table 1 of the appendix to OAC rule 3745-17-11 as follows:

for $0.05 < (P) < 30$, $(E) = 4.10\ (P)^{0.67}$

Where,

P = process weight at maximum capacity = 1.32 tons per hour (2,640 lb/hr)

E = Allowable rate of PE

Therefore,

$E = 4.10(1.32\ \text{tons/hr})^{0.67} = 4.94$ pounds per hour

If required, PE 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.

g) Miscellaneous Requirements

(1) None.

3. R001, Paint Booth #1

Operations, Property and/or Equipment Description:

Enclosed miscellaneous metal parts paint booth #1 controlled with a fabric filter with 100% capture and 98% control efficiency. R001 was installed 9/1/2011.

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

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

a. d)(2) - d)(5), e)(5)

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Install a fabric filter that is designed to achieve 100% capture and 98% control efficiency of PE/PM_{10}. See b)(2)a. below.
b.	OAC rule 3745-31-05(C), as effective 12/01/2006	See b)(2)b. below.
c.	ORC 3704.03(T)	The emission limitation established pursuant to this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(D).
d.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V status)	Volatile organic compound (VOC) emissions from coatings and cleanup material used from emissions units R001 and R002 combined shall not exceed 99.0 tons based on a rolling, 12-month summation.
e.	OAC rule 3745-21-09(U)(1)	Coating employed in this emissions unit

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		shall not exceed 3.5 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents, for any coating not listed as regulated.
f.	OAC rule 3745-17-11	Not applicable pursuant to OAC rule 3745-17-11(A)(1)(j).
g.	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.
h.	ORC 3704.03(F), OAC rule 3745-114	See d)(2)-(5) and e)(5) below.

(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 and Operate P0112553 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. Apply all spray coatings within a spray booth with 100% captureand equipped with particulate filter with a minimum 98% control efficiency and the use of airless spray guns with a minimum of 75% transfer efficiency; and

ii. PE shall not exceed 0.83 ton per year.

c. All hazardous waste generated from R001 and/or R002 shall be manifested off site to a permitted hazardous waste treatment, storage or disposal facility.

c) Operational Restrictions

(1) The maximum material usage (coatings and cleanup) for emissions units R001 and R002 combined shall not cause emissions to exceed 99.0 tons of VOC, based on a rolling, 12-month summation, and the following equations:

a. $$X = \sum_{i=1}^{n}(G)(V)/2{,}000\text{lbs}$$

where:

X = tons of VOC emissions/month;
G= monthly usage of each coating and cleanup material, in gallons;
V= VOC content of each coating and cleanup material, in pounds VOC/gallon;
n = total number of coatings; and

$$\sum_{i=1}^{m}(X) \text{ is} \leq 99.0 \text{ tons VOC, as a rolling 12-month summation}$$

where:

m = months in the rolling, 12-month period

b. To ensure enforceability during the first 12 calendarmonths of operation or the first 12 calendar months following the issuance of this permit,the permittee shall not exceed the levels specified in the following table for the maximum allowable cumulative VOC emissions in tons from R001 and R002 combined:

Month(s)	Max Allowable Cumulative VOC (tons)
1	8.25
1 - 2	16.5
1 - 3	24.75
1 - 4	33
1 - 5	41.25
1 - 6	49.5
1 - 7	57.75
1 - 8	66
1 - 9	74.25
1 - 10	82.5
1 - 11	90.75
1 - 12	99.0

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual limitation shall be based upon a rolling, 12-month summation of the usage figures.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in this emissions unit:

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

b. the number of gallons of each coating applied;

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

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

e. the maximum VOC content of each cleanup material employed, in pounds per gallon;

f. the total VOC emissions from all coatings and cleanup materials employed [the sum of (b. times d.) for all coatings plus (c. times e.) for all cleanup materials] divided by 2,000, in tons;

g. during the first 12 calendar months of operation (or the first 12 calendar months following the issuance of this permit), the cumulativeemissions for R001 and R002 combined for each calendar month;

h. beginning after the first 12 calendar months of operation (or the first 12 calendar months following the issuance of this permit), the rolling, 12-month summation of the total VOC emissions for R001 and R002 combined i.e., the summation of the total VOC emissions, as recorded in “h” above, for the present month plus the previous 11 months of operation, in ton(s);

(2) Thepermit-to-install and operate (PTIO) application for this emissions unit, R001, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

d. The following summarizes the results of dispersion modeling for the "worst case" toxic contaminant:

Toxic Contaminant: xylenes (and ethylbenzene)

TLV (mg/m3): 434.192

Maximum Hourly Emission Rate (lbs/hr): 4.675 (xylenes)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7436

MAGLC (ug/m3): 10337.91

The permittee, has demonstrated that emissions of xylenes, from emissions unitR001, is calculated to be less than eighty percent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

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

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

(6) The permittee shall collect and record the following information each month for the coating or printing line and shall maintain this information at the facility for a period of three years:

a. the name and identification number or each coating, as applied;

b. the mass of VOC per volume of each coating, excluding water and exempt solvents, as applied.

This information does not have to be kept on a line-by-line basis.If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

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 submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. VOC emissions from all coatings and cleanup materials used, for emissions unit R001 and R002 combined, shall not exceed 99.0 tons based on a rolling, 12-month summation.

ii. All exceedances of the rolling, 12-month limitation on VOC usage/emissions; and for the first 12 calendar months of operation (or the first 12 calendar months following the issuance of this permit), all exceedances of the maximum allowable cumulative VOC usage/emissions levels.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

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

(4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

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

f) Testing Requirements

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

a. Emissions Limitations:

Install a fabric filter that is designed to achieve 100% capture and 98% control efficiency of PE/PM_{10}.

Applicable Compliance Method:

If required, PE 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". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

b. Emissions Limitation:

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

Applicable Compliance Method:

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

c. Emissions Limitations:

VOC emissions from coatings and cleanup material usedfrom emissions units R001 and R002 combined shall not exceed 99.0 tons based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with these emissions limitations shall be demonstrated by the recordkeeping in d)(1).

d. Emissions Limitation:

Coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, as applied, excluding water and exemptsolvents, for any coating not listed as regulated.

Applicable Compliance Method:

The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

i. the name and identification number of each coating, as applied; and

ii. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

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

where:

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

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

V_S = volume fraction of solids 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.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific gallons/year and/or tons/year limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

g) Miscellaneous Requirements

(1) None.

4. R002, Paint Booth #2

Operations, Property and/or Equipment Description:

Enclosed miscellaneous metal parts paint booth #2 controlled with a fabric filter with 100% capture and 98% control

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

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

a. d)(2) - d)(5), e)(5)

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Install a fabric filter that is designed to achieve 100% capture and 98% control efficiency of PE/PM_{10}. See b)(2)a. below.
b.	OAC rule 3745-31-05(C), as effective 12/01/2006	See b)(2)b. below.
c.	ORC 3704.03(T)	The emission limitation established pursuant to this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(D).
d.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V status)	Volatile organic compound (VOC) emissions from coatings and cleanup material used from emissions units R001 and R002 combined shall not exceed 99.0 tons based on a rolling, 12-month summation.
c.	OAC rule 3745-21-09(U)(1)	Coating employed in this emissions unit

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		shall not exceed 3.5 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents, for any coating not listed as regulated.
d.	OAC rule 3745-17-11	Not applicable pursuant to OAC rule 3745-17-11(A)(1)(j).
e.	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.
f.	ORC 3704.03(F), OAC rule 3745-114	See d)(2)-(5) below.

(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 and Operate P0112553 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. Apply all spray coatings within a spray booth with 100% captureand equipped with particulate filter with a minimum 98% control efficiency and the use of airless spray guns with a minimum of 75% transfer efficiency; and

ii. PE shall not exceed 0.83 ton per year.

c. All hazardous waste generated from R001 and/or R002 shall be manifested off site to a permitted hazardous waste treatment, storage or disposal facility.

c) Operational Restrictions

(1) The maximum material usage (coatings and cleanup) for emissions units R001 and R002 combined shall not cause emissions to exceed 99.0 tons of VOC, based on a rolling, 12-month summation, and the following equations:

a.

$$X = \sum_{i=1}^{n}(G)(V)/2{,}000\text{lbs}$$

where:

X = tons of VOC emissions/month;
G= monthly usage of each coating and cleanup material, in gallons;
V= VOC content of each coating and cleanup material, in pounds VOC/gallon;
n = total number of coatings; and

$$\sum_{i=1}^{m}(X) \text{ is} \leq 99.0 \text{ tons VOC, as a rolling 12-month summation}$$

where:

m = months in the rolling, 12-month period

b. To ensure enforceability during the first 12 calendarmonths of operation or the first 12 calendar months following the issuance of this permit,the permittee shall not exceed the levels specified in the following table for the maximum allowable cumulative VOC emissions in tons from R001 and R002 combined:

Month(s)	Max Allowable Cumulative VOC (tons)
1	8.25
1 - 2	16.5
1 - 3	24.75
1 - 4	33
1 - 5	41.25
1 - 6	49.5
1 - 7	57.75
1 - 8	66
1 - 9	74.25
1 - 10	82.5
1 - 11	90.75
1 - 12	99.0

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual limitation shall be based upon a rolling, 12-month summation of the usage figures.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in this emissions unit:

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

b. the number of gallons of each coating applied;

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

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

e. the maximum VOC content of each cleanup material employed, in pounds per gallon;

f. the total VOC emissions from all coatings and cleanup materials employed [the sum of (b. times d.) for all coatings plus (c. times e.) for all cleanup materials] divided by 2,000, in tons;

g. during the first 12 calendar months of operation (or the first 12 calendar months following the issuance of this permit), the cumulative emissions for R001 and R002 combined for each calendar month;

h. beginning after the first 12 calendar months of operation (or the first 12 calendar months following the issuance of this permit), the rolling, 12-month summation of the total VOC emissions for R001 and R002 combined i.e., the summation of the total VOC emissions, as recorded in “h” above, for the present month plus the previous 11 months of operation, in ton(s);

(2) Thepermit-to-install and operate (PTIO) application for this emissions unit, R002, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

d. The following summarizes the results of dispersion modeling for the "worst case" toxic contaminant:

Toxic Contaminant: xylenes (and ethylbenzene)

TLV (mg/m3): 434.192

Maximum Hourly Emission Rate (lbs/hr): 4.675 (xylenes)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 51.72

MAGLC (ug/m3): 10337.91

The permittee, has demonstrated that emissions of xylenes, from emissions unitR002, is calculated to be less than eighty percent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

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

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

(6) The permittee shall collect and record the following information each month for the coating or printing line and shall maintain this information at the facility for a period of three years:

a. the name and identification number or each coating, as applied;

b. the mass of VOC per volume of each coating, excluding water and exempt solvents, as applied

This information does not have to be kept on a line-by-line basis.If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. VOC emissions from all coatings and cleanup materials used, for emissions unit R001 and R002 combined, shall not exceed 99.0 tons based on a rolling, 12-month summation.

ii. All exceedances of the facility wide rolling, 12-month limitation on VOC usage/emissions; and for the first 12 calendar months of operation (or the first 12 calendar months following the issuance of this permit), all exceedances of the maximum allowable cumulative VOC usage/emissions levels.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

(2) 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.

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

(4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

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

f) Testing Requirements

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

a. Design Standard:

Install a fabric filter that is designed to achieve 100% capture and 98% control efficiency of PE/PM_{10}.

Applicable Compliance Method:

If required, PE 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". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

b. Emissions Limitation:

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

Applicable Compliance Method:

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

c. Emissions Limitations:

VOC emissions from coatings and cleanup material usedfrom emissions units R001 and R002 combined shall not exceed 99.0 tons based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with these emissions limitations shall be demonstrated by the recordkeeping in d)(1).

d. Emissions Limitation:

Coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, as applied, excluding water and exemptsolvents, for any coating not listed as regulated.

Applicable Compliance Method:

The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

i. the name and identification number of each coating, as applied; and

ii. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

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

where:

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

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

V_S = volume fraction of solids 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.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific gallons/year and/or tons/year limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

g) Miscellaneous Requirements

(1) None.