

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

6/10/2014

Certified Mail

Allen Francis  
Production Paint Finishers, Inc.  
140 Center Street  
Bradford, OH 45308-0127

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0819030169  
Permit Number: P0116940  
Permit Type: Administrative Modification  
County: Darke

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

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

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

**How to appeal this permit**

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

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

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://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](http://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](http://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 Regional Air Pollution Control Agency at (937)225-4435 or 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: U.S. EPA  
RAPCA; Indiana



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
Production Paint Finishers, Inc.**

Facility ID:	0819030169
Permit Number:	P0116940
Permit Type:	Administrative Modification
Issued:	6/10/2014
Effective:	6/10/2014





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Production Paint Finishers, Inc.

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**Final Permit-to-Install**  
Production Paint Finishers, Inc.  
**Permit Number:** P0116940  
**Facility ID:** 0819030169  
**Effective Date:** 6/10/2014

## Authorization

Facility ID: 0819030169  
Facility Description: metal coating and allied services  
Application Number(s): M0002792  
Permit Number: P0116940  
Permit Description: Administrative PTI modification to change an emissions unit description to more accurately reflect its operation.  
Permit Type: Administrative Modification  
Permit Fee: \$0.00  
Issue Date: 6/10/2014  
Effective Date: 6/10/2014

This document constitutes issuance to:

Production Paint Finishers, Inc.  
140 Center Street  
Bradford, OH 45308-0127

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

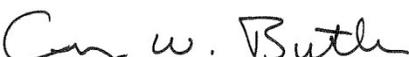
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Regional Air Pollution Control Agency  
117 South Main Street  
Dayton, OH 45422-1280  
(937)225-4435

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



**Final Permit-to-Install**  
Production Paint Finishers, Inc.  
**Permit Number:** P0116940  
**Facility ID:** 0819030169  
**Effective Date:**6/10/2014

## Authorization (continued)

Permit Number: P0116940

Permit Description: Administrative PTI modification to change an emissions unit description to more accurately reflect its operation.

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

<b>Emissions Unit ID:</b>	<b>K004</b>
Company Equipment ID:	Spray Booth 4
Superseded Permit Number:	P0104859
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install**  
Production Paint Finishers, Inc.  
**Permit Number:** P0116940  
**Facility ID:** 0819030169  
**Effective Date:** 6/10/2014

## **A. Standard Terms and Conditions**



## **1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

## **2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## **3. General Requirements**

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Regional Air Pollution Control Agency.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Regional Air Pollution Control 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 A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Regional Air Pollution Control 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.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Regional Air Pollution Control 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).

## **6. Compliance Requirements**

- a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted



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

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
  
- c) The permittee shall submit progress reports to the Regional Air Pollution Control 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:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

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



**8. Air Pollution Nuisance**

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

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Regional Air Pollution Control 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 Regional Air Pollution Control 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 quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**10. Applicability**

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

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

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



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

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

## **12. Permit-To-Operate Application**

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



**13. Construction Compliance Certification**

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

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

**14. Public Disclosure**

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

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

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

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

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



**Final Permit-to-Install**  
Production Paint Finishers, Inc.  
**Permit Number:** P0116940  
**Facility ID:** 0819030169  
**Effective Date:**6/10/2014

## **B. Facility-Wide Terms and Conditions**



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
  
2. 40 CFR Part 63, Subpart A:

Emissions units K001, K004, K006, K007, and K008 are subject to the provisions of the General Provisions of the National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63, Subpart A).

The applicable provisions of 40 CFR Part 63, Subpart A are identified in Table 2 of 40 CFR Part 63, Subpart MMMM and Table 2 of 40 CFR Part 63, Subpart PPPP.
  
3. 40 CFR Part 63, Subpart MMMM

Emissions units K001, K004, K006, K007, and K008 are subject to the provisions of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart MMMM).

  - a) Applicable Emissions Limitations, Operating Limitations, and Work Practice Limitations:

The permittee shall comply with the applicable limitations of 40 CFR Parts 63.3880 – 63.3901.
  - b) Monitoring and Record Keeping Requirements:

The permittee shall comply with the applicable monitoring and record keeping requirements of 40 CFR Parts 63.3910 – 63.3981.
  - c) Reporting Requirements:

The permittee shall comply with the applicable reporting requirements of 40 CFR Parts 63.3910 – 63.3981.
  - d) Testing Requirements:

The permittee shall comply with the applicable testing requirements of 40 CFR Parts 63.3910 – 63.3981.
  
4. 40 CFR Part 63, Subpart PPPP:

Emissions units K001, K004, K006, K007, and K008 are subject to the provisions of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products (40 CFR Part 63, Subpart PPPP).

  - a) Applicable Emissions Limitations, Operating Limitations, and Work Practice Limitations:

The permittee shall comply with the applicable limitations of 40 CFR Parts 63.4480 – 63.4501.
  - b) Monitoring and Record Keeping Requirements:



The permittee shall comply with the applicable monitoring and record keeping requirements of 40 CFR Parts 63.4510 – 63.4581.

c) Reporting Requirements:

The permittee shall comply with the applicable reporting requirements of 40 CFR Parts 63.4510 – 63.4581.

d) Testing Requirements:

The permittee shall comply with the applicable testing requirements of 40 CFR Parts 63.4510 – 63.4581

5. Predominant Activity Alternative Compliance Option for 40 CFR Part 63 Subpart M MMM and 40 CFR Part 63 Subpart P PPP:

The permittee has the option to comply with either 40 CFR Part 63 Subpart M MMM or 40 CFR Part 63 Subpart P PPP as stated in 40 CFR Part 63.3381(e)(2) of Subpart M MMM and 40 CFR Part 63.4481(e)(2) of Subpart P PPP.

Should the permittee choose the Predominant Activity Alternative Compliance Option, then the permittee must determine the predominant surface coating activity at the facility in order to establish the applicable rule requirements. This option is available to facilities that perform more than one type of surface coating operation. The predominant activity is identified as the surface coating activity that accounts for 90% or more of the permittee's coating operations.

This determination shall be performed annually as stated in 40 CFR Part 63.3381(e)(2)(ii) of Subpart M MMM and 40 CFR Part 63.4481(e)(2)(ii) of Subpart P PPP and shall be submitted to RAPCA by January 31 of each year.



**Final Permit-to-Install**  
Production Paint Finishers, Inc.  
**Permit Number:** P0116940  
**Facility ID:** 0819030169  
**Effective Date:** 6/10/2014

## **C. Emissions Unit Terms and Conditions**



**1. K004, Coating Line 4**

**Operations, Property and/or Equipment Description:**

Miscellaneous Metal Parts coating line including Paint Spray Booth 4 (with two spray guns and dry filtration) that never uses a total of more than 10 gallons of coating per day.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) ORC 3704.03(T) As effective November 30, 2001	The volatile organic compound (VOC) emissions from this emissions unit including cleanup shall not exceed 0.68 ton per month as a rolling 12-month average. Compliance with rule also includes compliance with OAC rule 3745-21-09(U)(2)(e)(iii).  See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) As effective December 1, 2006	See b)(2)a. and b)(2)c.
c.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)a.
d.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Major New Source Review)	See b)(2)d.
e.	OAC rule 3745-17-11(C)	See c)(1) and c)(2).
f.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
g.	40 CFR Part 63, Subpart M [40 CFR Part 63.3890(b)(1)]	The organic hazardous air pollutant (HAP) emissions from metal parts and products coating shall be limited to no more than 0.31 kg (2.6 lbs) organic HAP per liter (gallon), during each 12-month compliance period.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See Section B.3. and B.5.
h.	40 CFR Part 63, Subpart PPPP [40 CFR Part 63.4490(b)(1)]	The organic HAP emissions from plastic parts and products coating shall not exceed 0.16 kilogram (0.16 lb) per kilogram (lb) coating solids used during each 12-month compliance period.  See Section B.4. and B.5.
i.	40 CFR Part 63, Subpart A	Table 2 of 40 CFR Part 63, Subpart MMMM and Table 2 of 40 CFR Part 63, Subpart PPPP identify the applicable provisions of 40 CFR Part 63.1-15.

(2) Additional Terms and Conditions

- a. The coating operations in this emission unit include any miscellaneous metal coating operations and/or other coating operations completed in paint spray booth 4, and any regulated coating operation not included in the other permitted emissions units at the facility. The permittee shall not employ a total of more than ten gallons of coating per day in this emissions unit.
- b. 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.
- c. The BAT requirements of OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source. Compliance with the federally enforceable emissions limitations of OAC rule 3745-21-09(U)(2)(e)(iii) limit annual VOC emissions to less than 10 tons per year.  
  
This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
- d. This emissions unit has been in operation for more than 12-months and, as such, the permittee has existing records to generate the rolling, 12-month summation



of the emissions upon issuance of this permit. The VOC emissions from this emissions unit shall not exceed 8.2 tons per year, based upon a rolling, 12-month summation of the monthly VOC emissions, based on usage.

c) Operational Restrictions

- (1) The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter system shall be employed during all periods of coating application to control particulate emissions.
- (2) The permittee shall expeditiously repair the dry particulate filter system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for the coating line:
  - a. the name and identification of each coating employed;
  - b. the volume, in gallons, of each coating employed; and
  - c. the total volume, in gallons, of all of the coatings employed.
- (2) The permittee shall collect and record the following information each month for the purpose of determining the monthly and rolling 12-month VOC emissions for this emissions unit:
  - a. the name and identification of each coating, thinner and cleanup material employed;
  - b. the volume, in gallons, of each coating, thinner and cleanup material employed;
  - c. the maximum VOC content for each coating, thinner and cleanup material employed, in pounds per gallon;
  - d. the total VOC emissions from all coatings thinners and cleanup materials employed, in tons [the summation of d)(2)b. times d)(2)c. for all coatings, thinners and clean up materials, divided by 2,000 pounds per ton]; and
  - e. the rolling, 12-month summation of the total VOC emissions, in tons (this shall include the information for the current month and the preceding eleven calendar months).
  - f. The average VOC emissions from adhesive use as a rolling 12-month average, in tons per month (the combined VOC emissions calculated according to d)(1)e. for the previous 12- months divided by 12).



- (3) The permittee shall collect and record the following information each month for the purpose of determining annual organic compound (OC) emissions as required for the Title V Fee Emissions Report (FER):
  - a. the name and identification of each coating, thinner and cleanup material employed;
  - b. the OC content of each coating, thinner and cleanup material employed, in pounds per gallon;
  - c. the volume, in gallons, of each coating, thinner and cleanup material employed; and
  - d. the total OC emissions from all coatings, thinners and cleanup materials employed, in tons [the summation of d)(3)b. times d)(3)c. for all coatings, thinners and cleanup materials, divided by 2000 pounds per ton].
- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA or RAPCA upon request.
- (5) The permittee shall conduct periodic inspections of the dry particulate filter system 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. The permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA or RAPCA upon request.
- (6) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter system while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of the person who performed the inspection.

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



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

e) Reporting Requirements

- (1) The permittee shall notify RAPCA in writing of any daily record showing that the coating line employs more than 10 gallons of coating per day. The notification shall include a copy of such record and shall be sent to the RAPCA within 30 days after the exceedance occurs.
- (2) The permittee shall submit quarterly deviation reports that identify all exceedances of the rolling 12-month VOC emission limitation. The quarterly deviation reports shall be submitted to RAPCA in accordance with the Standard Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
- (3) The permittee shall submit annual reports that specify the total OC and VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual FER.
- (4) The permittee shall notify RAPCA 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 RAPCA within 30 days after the event occurs.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) and b)(2) shall be determined in accordance with the following method(s):
  - a. Emission Limitation –  
  
The permittee shall not employ more than ten gallons of coating per day in the paint spray booth.  
  
Applicable Compliance Method –  
  
Compliance shall be based upon the record keeping requirements of d)(1).



b. Emission Limitation –

The VOC emissions from this emissions unit shall not exceed 8.2 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(2).

c. Emission Limitation -

0.551 lb of PE per hour

Applicable Compliance Method -

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

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

where E = PE rate (lbs/hr);

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

CE = fractional control efficiency of the control equipment (0.99).

If requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

d. Emission Limitation -

2.41 tons of PE per year

Applicable Compliance Method -

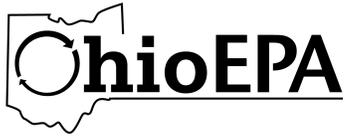
Compliance with the lb/hr emission limit demonstrates compliance with this limit because this limit is based on the lb/hr limit and 8,760 hours per year of operation.

e. Emission Limitation -

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

Applicable Compliance Method -

If requested by the Ohio EPA, compliance with the above visible emission limitation 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 USEPA Reference Method 9.



f. Emission Limitation –

VOC emissions from this emissions unit including cleanup shall not exceed 0.68 ton per month as a rolling 12-month average.

Applicable Compliance Method –

Compliance shall be determined according to the record keeping requirements of d)(2).

g) Miscellaneous Requirements

(1) None.