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

6/18/2014

Certified Mail

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

Amy Bishop
Caterpillar Logistics Inc.
500 N. Morton Ave
Dept. MT. 230
Morton, IL 61550

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0857035001
Permit Number: P0116659
Permit Type: Initial Installation
County: Montgomery

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 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: RAPCA

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Caterpillar Logistics Inc.

Facility ID:	0857035001
Permit Number:	P0116659
Permit Type:	Initial Installation
Issued:	6/18/2014
Effective:	6/18/2014
Expiration:	5/21/2019

Division of Air Pollution Control
Permit-to-Install and Operate
for
Caterpillar Logistics Inc.

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Authorization

Facility ID:	0857035001
Application Number(s):	A0050538
Permit Number:	P0116659
Permit Description:	FEPTIO for installation of new spray paint booth and a dip coating line.
Permit Type:	Initial Installation
Permit Fee:	$400.00
Issue Date:	6/18/2014
Effective Date:	6/18/2014
Expiration Date:	5/21/2019

Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

Caterpillar Logistics Inc.
6611 Hoke Rd
Clayton, OH 45315

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:

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

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: P0116659
Permit Description: FEPTIO for installation of new spray paint booth and a dip coating line.

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

Emissions Unit ID:	**K004**
Company Equipment ID:	Paint Spray Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K005**
Company Equipment ID:	dip tank
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) None.

C. Emissions Unit Terms and Conditions

1. K004, Paint Spray Booth

Operations, Property and/or Equipment Description:

miscellaneous metal parts coating, spray paint booth with paint booth filters

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. b)(1)d.

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.	ORC 3704.03(T) and OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) content of the coatings employed shall not exceed 3.0 pounds per gallon, as applied, excluding water and exempt solvents. Se 2)(b)a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(i) and 3745-31-05(D).
b.	OAC rule 3745-21-09(U)(1)(i)	The emissions limitation specified by this rule is equivalent to the limitation established pursuant to ORC 3704.03(T) and OAC rule 3745-31-05(A)(3). See b)(2)a., d)(1) and f)(2).
c.	OAC rule 3745-17-11(C)	See d)(3) through d)(7).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V)	The VOC emissions from this emissions unit shall not exceed 28.80 tons per year, including cleanup, as a rolling 12-month summation. See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has elected to comply with the VOC content limitation by use of complying coatings. Coatings applied in the coating operations shall not exceed 3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as $C_{VOC,2}$ shown in f)(2) below.

b. The rolling 12-month VOC emissions limitation is based upon and equivalent to the 12-month summation of the coating usage. The emissions of VOC from this emissions unit shall not exceed 28.80 tons per year, based upon a rolling, 12-month summation of the monthly emissions.To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissionsof VOC (Tons)
1	2.40
1-2	4.80
1-3	7.20
1-4	9.60
1-5	12.00
1-6	14.40
1-7	16.80
1-8	19.20
1-9	21.60
1-10	24.00
1-11	26.40
1-12	28.80

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

c) Operational Restrictions

(1) The permittee shall install, operate, and maintain a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

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

d) Monitoring and/or Recordkeeping Requirements

(1) In accordance with OAC rule 3745 21-09(B)(3)(f), the permittee 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:

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

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

If the permittee mixes complying coatings, it is not necessary to record the VOC content of the resulting mixture.

(2) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in this emissions unit:

a. the name and identification number of each coating employed;

b. the number of gallons of each coating applied or the number of gallons of all coatings applied during the month;

c. the maximum VOC content of each coating applied, or the maximum VOC content for any coating applied, in pounds per gallon;

d. the total VOC usage from all coatings applied [i.e., the summation of the products of "b" times "c" for all the individual coatings applied during the month], or the product of the maximum VOC content of any coating applied times the total gallons of coating employed during the month [i.e.,"b" times "c" for highest VOC content coating];

e. the name and identification of each cleanup material employed;

f. the VOC content of each cleanup material, in pounds per gallon;

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

h. the total VOC usage from all cleanup materials, in tons [i.e., the summation of the products of "f" times "g" for all cleanup materials employed];

i. the total VOC usage from all coatings and cleanup materials employed, in tons [i.e., the sum of "d" and "h"];

j. the rolling, 12-month summation of the VOC usage, including cleanup, in tons [i.e., summation of the monthly usages from "i" for the most recent 12 months].

Also, during the first 12 calendar months of operation, the permittee shall record the cumulative VOC usage for each calendar month.

These monthly records shall be maintained for the purpose of determining the rolling 12-month VOC usage, and the cumulative and rolling 12-month VOC emissions rates.

(3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. thename of person who performed the inspection.

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

(7) The permittee shall maintain records that document any time periods when the dry particulate filter 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 was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

(1) 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 District Office or 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 required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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 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.

(4) 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. for the first 12 calendar months of operation, any exceedanceof the maximum allowable cumulative VOC emission limitation;

ii. beginningafter the first 12 calendar months of operation, any exceedance of the rolling, 12-month VOC emission limitation.

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 OEPA Air Services each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

f) Testing Requirements

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

a. <u>Emissions Limitation:</u>

The VOC content of the coatings employed shall not exceed 3.0 pounds per gallon, as applied, excluding water and exempt solvents.

<u>Applicable Compliance Method:</u>

Compliance shall be based upon the record keeping specified in d)(1) and f)(2).

b. <u>Emissions Limitation:</u>

The VOC emissions from this emissions unit shall not exceed 28.80 tons per year, including cleanup, as a rolling 12-month summation.

<u>Applicable Compliance Method:</u>

This limitation was determined by multiplying the maximum VOC content for all the coatings (0.45 lb-VOC/gallon) by a maximum annual coating usage (126,490 gallons/year), adding the product of an annual cleanup material usage (1000 gallons/year) multiplied by the cleanup material VOC content (0.67 lb-VOC/gallon), dividing by 2000 lbs/ton. Compliance shall be based upon the record keeping specified in d)(2).

(2) 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:

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

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

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

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 a gallons/year and/or a tons/year limitation in a Permit-to-Install and Operate, 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.

(3) The VOC content of the coatings used in this emissions unit shall be determined using the methods and procedures specified in OAC rule 3745-21-10(B). USEPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

g) Miscellaneous Requirements

(1) This emissions unit is being installed to replace emissions units K001 and K002. The permittee shall permanently shut down emissions units K001 and K002 upon the completion of installation and startup of emissions unit K004.

2. K005, dip tank

Operations, Property and/or Equipment Description:

miscellaneous metal parts coating dip tank

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. b)(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.	ORC 3704.03(T) and OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) content of the coatings employed shall not exceed 3.0 pounds per gallon, as applied, excluding water and exempt solvents. Se 2)(b)a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(i) and 3745-31-05(D).
b.	OAC rule 3745-21-09(U)(1)(i)	The emissions limitation specified by this rule is equivalent to the limitation established pursuant to ORC 3704.03(T) and OAC rule 3745-31-05(A)(3). See b)(2)a., d)(1) and f)(2).
c.	OAC rule 3745-31-05(D) (Synthetic	The VOC emissions from this emissions

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	Minor to avoid Title V)	unit shall not exceed 55.72 tons per year, including cleanup, as a rolling 12-month summation. See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has elected to comply with the VOC content limitation by use of complying coatings. Coatings applied in the coating operations shall not exceed 3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as $C_{VOC,2}$ shown in f)(2) below.

b. The rolling 12-month VOC emissions limitation is based upon and equivalent to the 12-month summation of the coating usage. The emissions of VOC from this emissions unit shall not exceed 55.72 tons per year, based upon a rolling, 12-month summation of the monthly emissions.To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissionsof VOC (Tons)
1	4.64
1-2	9.29
1-3	13.93
1-4	18.57
1-5	23.22
1-6	27.86
1-7	32.50
1-8	37.15
1-9	41.79
1-10	46.43
1-11	51.08
1-12	55.72

After the first 12 calendar months of operation, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the VOC emissions.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In accordance with OAC rule 3745-21-09(B)(3)(f), the permittee 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:

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

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

If the permittee mixes complying coatings, it is not necessary to record the VOC content of the resulting mixture.

(2) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in this emissions unit:

a. the name and identification number of each coating employed;

b. the number of gallons of each coating applied or the number of gallons of all coatings applied during the month;

c. the maximum VOC content of each coating applied, or the maximum VOC content for any coating applied, in pounds per gallon;

d. the total VOC usage from all coatings applied [i.e., the summation of the products of “b” times “c” for all the individual coatings applied during the month], or the product of the maximum VOC content of any coating applied times the total gallons of coating employed during the month [i.e.,“b” times “c” for highest VOC content coating];

e. the name and identification of each cleanup material employed;

f. the VOC content of each cleanup material, in pounds per gallon;

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

h. the total VOC usage from all cleanup materials, in tons [i.e., the summation of the products of “f” times “g” for all cleanup materials employed];

i. the total VOC usage from all coatings and cleanup materials employed, in tons [i.e., the sum of “d” and “h”]; and

j. the VOC usage, including cleanup, in tons, as a rolling 12-month summation [i.e., summation of the monthly emissions from “i” for the most recent 12 months].

Also, during the first 12 calendar months of operation, the permittee shall record the cumulative VOC usage for each calendar month.

These monthly records shall be maintained for the purpose of determining the rolling 12-month VOC usage, and the cumulative and rolling 12-month VOC emissions rates.

e) Reporting Requirements

(1) 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 District Office or 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 required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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 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.

(4) 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. for the first 12 calendar months of operation, any exceedanceof the maximum allowable cumulative VOC emission limitation;

ii. beginningafter the first 12 calendar months of operation, any exceedance of the rolling, 12-month VOC emission limitation.

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 OEPA Air Services each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

f) Testing Requirements

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

a. <u>Emissions Limitation:</u>

The VOC content of the coatings employed shall not exceed 3.0 pounds per gallon, as applied, excluding water and exempt solvents.

<u>Applicable Compliance Method:</u>

Compliance shall be based upon the record keeping specified in d)(1) and f)(2).

b. <u>Emissions Limitation:</u>

The VOC emissions from this emissions unit shall not exceed 55.72 tons per year, including cleanup, as a rolling 12-month summation.

<u>Applicable Compliance Method:</u>

This limitation was determined by multiplying the maximum VOC content for all the coatings (0.20 lb-VOC/gallon) by a maximum annual coating usage (557,189 gallons/year), dividing by 2000 lbs/ton. Compliance shall be based upon the record keeping specified in d)(2).

(2) 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:

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

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

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

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 a gallons/year and/or a tons/year limitation in a Permit-to-Install and Operate, 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.

(3) The VOC content of the coatings used in this emissions unit shall be determined using the methods and procedures specified in OAC rule 3745-21-10(B). USEPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

g) Miscellaneous Requirements

(1) This emissions unit is being installed to replace emissions units K003. The permittee shall permanently shut down emissions units K003 upon the completion of installation and startup of emissions unit K005.