



10/28/2014

Certified Mail

Jack Carney
Mettler Toledo, Inc.
6600 Huntley Road
Worthington, OH 43229

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0125041956
Permit Number: P0117739
Permit Type: Administrative Modification
County: Franklin

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-CDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Mettler Toledo, Inc.**

Facility ID:	0125041956
Permit Number:	P0117739
Permit Type:	Administrative Modification
Issued:	10/28/2014
Effective:	10/28/2014
Expiration:	5/24/2016



**Division of Air Pollution Control
Permit-to-Install and Operate**

for
Mettler Toledo, Inc.

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Final Permit-to-Install and Operate
Mettler Toledo, Inc.
Permit Number: P0117739
Facility ID: 0125041956
Effective Date: 10/28/2014

Authorization

Facility ID: 0125041956
Application Number(s): M0003026
Permit Number: P0117739
Permit Description: Administrative modification to incorporate P001 into K001, and P005 into K003.
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 10/28/2014
Effective Date: 10/28/2014
Expiration Date: 5/24/2016
Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

This document constitutes issuance to:

Mettler Toledo, Inc.
6600 Huntley Road
Worthington, OH 43229

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

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

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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



Final Permit-to-Install and Operate
Mettler Toledo, Inc.
Permit Number: P0117739
Facility ID: 0125041956
Effective Date: 10/28/2014

Authorization (continued)

Permit Number: P0117739
Permit Description: Administrative modification to incorporate P001 into K001, and P005 into K003.

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

Emissions Unit ID:	K001
Company Equipment ID:	K001
Superseded Permit Number:	P0108526
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	K003
Superseded Permit Number:	P0108526
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Mettler Toledo, Inc.
Permit Number: P0117739
Facility ID: 0125041956
Effective Date: 10/28/2014

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 being permanently shut down without first applying for and obtaining a permit pursuant to 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.



Final Permit-to-Install and Operate

Mettler Toledo, Inc.

Permit Number: P0117739

Facility ID: 0125041956

Effective Date: 10/28/2014

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

Mettler Toledo, Inc.

Permit Number: P0117739

Facility ID: 0125041956

Effective Date: 10/28/2014

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.



Final Permit-to-Install and Operate
Mettler Toledo, Inc.
Permit Number: P0117739
Facility ID: 0125041956
Effective Date: 10/28/2014

C. Emissions Unit Terms and Conditions



1. K001, K001

Operations, Property and/or Equipment Description:

#1 Floor Scale Paint Line, bake oven, and still used for recovery of paint equipment cleaning solvent

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)f., b)(2)a. – c., c)(2) – (3), d)(3) and e(3)

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) [Established by PTI 01-2249, issued final 12/20/1989]	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), 3745-21-09(U)(1)(b), and 3745-21-09(U)(1)(c).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed twenty percent opacity, as a six minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 lb/hr based on Table I, which is more stringent than the allowable PE rate from Figure II.
d.	OAC rule 3745-21-09(U)(1)(b)	The volatile organic compounds (VOC) content of the zinc rich primer coatings shall not exceed 4.0 pounds per gallon (lbs/gal), excluding water and exempt solvents.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-21-09(U)(1)(c)	The VOC contents of the extreme performance coatings shall not exceed 3.5 lbs/gal, excluding water and exempt solvents.
f.	OAC rule 3745-31-05(D) [Synthetic Minor to avoid Title V and MACT applicability]	See b)(2)a. – b)(2)c.

(2) Additional Terms and Conditions

- a. VOC emissions from all coatings, thinners, and cleanup materials employed in K001 and K003 combined shall not exceed 54.1 tons per rolling, 12-month period.
- b. Individual hazardous air pollutant (HAP) emissions from all coatings, thinners, and cleanup materials employed in emissions units K001 and K003 combined, shall not exceed 9.9 tons per rolling, 12-month period.
- c. Combined HAP emissions from all coatings, thinners, and cleanup materials employed in emissions units K001 and K003 combined, shall not exceed 24.9 tons per rolling, 12-month period.

c) Operational Restrictions

- (1) The permittee shall operate and maintain the dry filtration system when this emissions unit is in operation.
- (2) The maximum annual coating usage for emissions units K001 and K003 shall not exceed 27,200 gallons of Extreme Performance Coatings, with a maximum VOC content of 3.5 pounds per gallon, and 250 gallons for Zinc Rich Primer, with a maximum VOC content of 4.0 pounds per gallon, based upon a rolling 12-month summation of coating usage figures.
- (3) The maximum annual cleanup material usage for emissions units K001 and K003 shall not exceed 1,800 gallons, based upon a rolling 12-month summation of the cleanup/solvent material usage figures.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records and document any time period when the dry filtration system was not in service when the emissions unit was in operation.
- (2) The permittee shall collect and record the following information each month for the paint line:



- a. the name and identification of each coating;
 - b. whether each coating is an extreme performance coating or a zinc rich primer coating; and
 - c. the VOC content of each coating (excluding water and exempt solvents) in pounds per gallon, as applied.
- (3) The permittee shall collect and record the following information each month for emissions units K001 and K003:
- a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating, as applied;
 - c. the individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - d. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from c);
 - e. the number of gallons of each coating employed;
 - f. the name and identification of each cleanup/solvent material employed;
 - g. the VOC content of each cleanup/solvent material employed;
 - h. the individual HAP content of each HAP of each cleanup/solvent material in pounds of individual HAP per gallon cleanup/solvent material, as applied;
 - i. the total combined HAP content of each cleanup/solvent material in pounds of combined HAPs per gallon of cleanup/solvent material, as applied (sum of all individual HAP contents from h.);
 - j. the number of gallons of each cleanup/solvent material employed;
 - k. the total VOC emissions from all coating, in pounds or tons per rolling, 12-month period (the sum of b. times e. for each coating);
 - l. the total VOC emissions from all cleanup/solvent materials, in pounds or tons per rolling, 12-month period (the sum of g. times j. for each cleanup/solvent material);
 - m. the total individual HAP emissions for each HAP from all coating and cleanup/solvent material in pounds or tons per rolling, 12-month period (for each HAP the sum of c. times e. for each coating and the sum of h. times j. for each cleanup/solvent material); and
 - n. The total combined HAP emissions from all coating and cleanup/solvent materials employed, in pounds or tons per month and pounds or tons per rolling,



12-month period (the sum of d. times e. for each coating plus the sum of i. times j. for each cleanup/solvent material).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvent contained in the interior coatings or clean materials. This information does not have to be kept on a line by line basis.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall 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.
- (3) 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. the rolling, 12-month zinc rich primer coating usage limitation;
 - ii. the rolling, 12-month extreme performance coating usage limitation;
 - iii. the rolling, 12-month cleanup usage limitation;
 - iv. the rolling, 12-month VOC emission limitation;
 - v. the rolling, 12-month total individual HAP emission limitation; and
 - vi. the rolling, 12-month total combined HAP emissions 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 Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

f) Testing Requirements

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

- a. Emission Limitation

Visible particulate emissions from any stack serving this emissions unit shall not exceed twenty percent opacity, as a six minute average, except as provided by the rule.

Applicable Compliance Method(s)

If required, compliance with the visible emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B).

- b. Emission Limitation

PE shall not exceed 0.551 lb/hr

Applicable Compliance Method(s)

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

$$E = \text{maximum coating solids usage rate (in lbs/hr)} * (1-TE) * (1-CE)$$

$$E = \text{maximum PE rate (lbs/hr)}$$

TE = transfer efficiency, which is the ration of the amount of coating solids deposited on the coated part to the amount of coating solids used (60% per 40 CFR Part 60.313)



CE = control efficiency of the dry filtration system (90% per manufacturer's data)

If required, compliance with the PE limit shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

c. Emission Limitation

The VOC content of each extreme performance coating shall not exceed 3.5 lbs/gal, excluding water and exempt solvents.

Applicable Compliance Method(s)

Compliance shall be determined by the recordkeeping in Section d)(2). Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

d. Emission Limitation

The VOC content of each zinc rich primer coating shall not exceed 4.0 lbs/gal, excluding water and exempt solvents.

Applicable Compliance Method(s)

Compliance shall be determined by the recordkeeping in Section d)(2). Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

e. Emission Limitation for K001 and K003 combined

VOC emissions for K001 and K003 combined from the application of coatings and cleanup/solvent materials shall not exceed 54.1 tons per rolling, 12-month period.

Applicable Compliance Method(s)

Compliance shall be determined by the recordkeeping in Section d)(3).

f. Emissions Limitation for K001 and K003

Individual HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001 and K003 combined shall not exceed 9.9 tons per rolling, 12-month period.

Combined HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001 and K003 shall not exceed 24.9 tons per rolling, 12-month period.



Final Permit-to-Install and Operate

Mettler Toledo, Inc.

Permit Number: P0117739

Facility ID: 0125041956

Effective Date: 10/28/2014

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in Section d)(3)m.-n.

g) Miscellaneous Requirements

(1) None.



2. K003, K003

Operations, Property and/or Equipment Description:

Spray Paint Booth, bake oven, and still used for recovery of paint equipment cleaning solvent

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. d)(3) – (5), and e)(5)
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)f., b)(2)b. – d., c)(2) – (3), and d)(2)
- 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) [Established by PTI 01-6792, issued final 9/24/1997]	<p>Volatile organic compound (VOC) emissions shall not exceed 120 pounds per hour (lbs/hr).</p> <p>The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), 3745-21-09(U)(1)(b), and 3745-21-09(U)(1)(c).</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed twenty percent opacity, as a six minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 lb/hr based on Table I, which is more stringent than the allowable PE rate from Figure II.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-21-09(U)(1)(b)	The VOC content of the zinc rich primer coatings shall not exceed 4.0 pounds per gallon (lbs/gal), excluding water and exempt solvents.
e.	OAC rule 3745-21-09(U)(1)(c)	The VOC contents of the extreme performance coatings shall not exceed 3.5 lbs/gal, excluding water and exempt solvents.
f.	OAC rule 3745-31-05(D) [Synthetic Minor to avoid Title V and MACT]	See b)(2)b. – b)(2)d.
g.	Ohio Air Toxic Policy	See d)(3) – (5), and e)(6)

(2) Additional Terms and Conditions

- a. The hourly VOC emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, monitoring, recordkeeping, or reporting requirements are not necessary to ensure compliance with this emission limitation.
- b. VOC emissions from all coatings, thinners, and cleanup materials employed in K001 and K003 combined shall not exceed 54.1 tons per rolling, 12-month period.
- c. Individual hazardous air pollutant (HAP) emissions from all coatings, thinners, and cleanup materials employed in emissions units K001 and K003 combined, shall not exceed 9.9 tons per rolling, 12-month period.
- d. Combined HAP emissions from all coatings, thinners, and cleanup materials employed in emissions units K001 and K003 combined, shall not exceed 24.9 tons per rolling, 12-month period.

c) Operational Restrictions

- (1) The permittee shall operate and maintain the dry filtration system when this emissions unit is in operation.
- (2) The maximum annual coating usage for emissions units K001 and K003 shall not exceed 27,200 gallons of Extreme Performance Coatings, with a maximum VOC content of 3.5 pounds per gallon, and 250 gallons for Zinc Rich Primer, with a maximum VOC content of 4.0 pounds per gallon, based upon a rolling 12-month summation of coating usage figures.



- (3) The maximum annual cleanup material usage for emissions units K001 and K003 shall not exceed 1,800 gallons, based upon a rolling 12-month summation of the cleanup/solvent material usage figures.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall maintain daily records and document any time period when the dry filtration system was not in service when the emissions unit was in operation.
- (2) The permittee shall collect and record the following information each month for emissions units K001 and K003:
- a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating, as applied;
 - c. the individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - d. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from c);
 - e. the number of gallons of each coating employed;
 - f. the name and identification of each cleanup/solvent material employed;
 - g. the VOC content of each cleanup/solvent material employed;
 - h. the individual HAP content of each HAP of each cleanup/solvent material in pounds of individual HAP per gallon cleanup/solvent material, as applied;
 - i. the total combined HAP content of each cleanup/solvent material in pounds of combined HAPs per gallon of cleanup/solvent material, as applied (sum of all individual HAP contents from h.);
 - j. the number of gallons of each cleanup/solvent material employed;
 - k. the total VOC emissions from all coating, in pounds or tons per rolling, 12-month period (the sum of b. times e. for each coating);
 - l. the total VOC emissions from all cleanup/solvent materials, in pounds or tons per rolling, 12-month period (the sum of g. times j. for each cleanup/solvent material);
 - m. the total individual HAP emissions for each HAP from all coating and cleanup/solvent material in pounds or tons per rolling, 12-month period (for each HAP the sum of c. times e. for each coating and the sum of h. times j. for each cleanup/solvent material); and
 - n. The total combined HAP emissions from all coating and cleanup/solvent materials employed, in pounds or tons per month and pounds or tons per rolling,



12-month period (the sum of d. times e. for each coating plus the sum of i. times j. for each cleanup/solvent material).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting you Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvent contained in the interior coatings or clean materials. This information does not have to be kept on a line by line basis.

- (3) The permit to install for emissions units K003 and P005 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The followings summarizes the results of the modeling for "worst case" pollutant(s):

Toxic Contaminant: **Methyl Ethyl Ketone**

TLV (mg/m3): **590**

Maximum Hourly Emission Rate (lbs/hr): **3.52**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **151**

MAGLC (ug/m3): **14,048**

Toxic Contaminant: **Toluene**

TLV (mg/m3): **188**

Maximum Hourly Emission Rate (lbs/hr): **8.70**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **188**

MAGLC (ug/m3): **4,476**

- (4) Physical changes to or changes to the method of operation of K003 and P005 after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters; the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:



- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials used or the use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g. increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (5) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final federally enforceable permit-to-install and operate (FEPTIO) prior to the change.
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall 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.



- (3) 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. the rolling, 12-month zinc rich primer coating usage limitation;
 - ii. the rolling, 12-month extreme performance coating usage limitation;
 - iii. the rolling, 12-month cleanup usage limitation;
 - iv. the rolling, 12-month VOC emission limitation;
 - v. the rolling, 12-month total individual HAP emission limitation; and
 - vi. the rolling, 12-month total combined HAP emissions 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 Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (5) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.



f) Testing Requirements

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

a. Emission Limitation

VOC emissions from coatings shall not exceed 120 lbs/hr

Applicable Compliance Method(s)

The hourly emission limitation was developed by multiplying the maximum hourly coating throughput of 30 gallons/hour by the maximum VOC content of 4.0 lbs/gallon. Therefore, compliance with this emission limitation can be assumed provided the permittee complies with the applicable VOC content limitations for the coatings.

If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A.

b. Emission Limitation

Visible particulate emissions from any stack serving this emissions unit shall not exceed twenty percent opacity, as a six minute average, except as provided by the rule.

Applicable Compliance Method(s)

If required, compliance with the visible emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B).

c. Emission Limitation

PE shall not exceed 0.551 lb/hr

Applicable Compliance Method(s)

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

$$E = \text{maximum coating solids usage rate (in lbs/hr)} * (1-TE) * (1-CE)$$

$$E = \text{maximum PE rate (lbs/hr)}$$

TE = transfer efficiency, which is the ration of the amount of coating solids deposited on the coated part to the amount of coating solids used (60% per 40 CFR Part 60.313)



CE = control efficiency of the dry filtration system (90% per manufacturer's data)

If required, compliance with the PE limit shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

d. Emission Limitation

The VOC content of each extreme performance coating shall not exceed 3.5 lbs/gal, excluding water and exempt solvents.

Applicable Compliance Method(s)

Compliance shall be determined by the recordkeeping in Section d)(2). Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

e. Emission Limitation

The VOC content of each zinc rich primer coating shall not exceed 4.0 lbs/gal, excluding water and exempt solvents.

Applicable Compliance Method(s)

Compliance shall be determined by the recordkeeping in Section d)(2). Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

f. Emission Limitation for K001 and K003

VOC emissions for K001 and K003 combined from the application of coatings and cleanup/solvent materials shall not exceed 54.1 tons per rolling, 12-month period.

Applicable Compliance Method(s)

Compliance shall be determined by the recordkeeping in Section d)(3).

g. Emissions Limitation for K001 and K003

Individual HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001 and K003 combined shall not exceed 9.9 tons per rolling, 12-month period.

Combined HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001 and K003 shall not exceed 24.9 tons per rolling, 12-month period.



Final Permit-to-Install and Operate

Mettler Toledo, Inc.

Permit Number: P0117739

Facility ID: 0125041956

Effective Date: 10/28/2014

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in Section d)(3)m.-n.

g) Miscellaneous Requirements

(1) None.