State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
BUTLER COUNTY

Street Address:
50 West Town Street, Suite 700
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 14-05946
Fac ID: 1409040883
DATE: 9/18/2007

Trans-Acc., Inc. / Hamilton
Matt Flory
11167 Deerfield Road
Cincinnati, OH 45242-2094

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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 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
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **HCDES**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 9/18/2007**
Terms and Conditions	**Effective Date: 9/18/2007**

FINAL PERMIT TO INSTALL 14-05946

Application Number:	14-05946
Facility ID:	1409040883
Permit Fee:	**$400**
Name of Facility:	Trans-Acc., Inc. / Hamilton
Person to Contact:	Matt Flory
Address:	11167 Deerfield Road Cincinnati, OH 45242-2094

Location of proposed air contaminant source(s) [emissions unit(s)]:
1005 South 9th Street
Hamilton, **Ohio**

Description of proposed emissions unit(s):
Consolidation of existing operations into a single coating line.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

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

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
VOC	89.32
PE/PM10	3.42
NOx	5.37
CO	4.49

Emissions Unit ID: **K004**

Issued: 9/18/2007

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K004) - Miscellaneous Metal Parts Coating Line, consisting of surface pretreatment, three duplex spray coating application stations, a powder coating application station, and drying ovens connected by a monorail conveyor system.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See terms and conditions A.2.a and A.2.k.
OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 168 pounds per hour, excluding cleanup and cleaning solvent. See term and condition A.2.i. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(b), 3745-21-09(U)(1)(c), 3745-21-09(U)(1)(d), 3745-21-09(U)(1)(i), and 3745-31-05(C).
OAC rule 3745-31-05(C) Synthetic Minor to Avoid Title V and Non-Attainment New Source Review	See terms and conditions A.2.b, A.2.c, and Section B.1.
OAC rule 3745-21-09(U)(1)(b)	See term and condition A.2.d.
OAC rule 3745-21-09(U)(1)(c)	See term and condition A.2.e.
OAC rule 3745-21-09(U)(1)(d)	See term and condition A.2.f.
OAC rule 3745-21-09(U)(1)(i)	See term and condition A.2.g.
OAC rule 3745-17-07(A)(1)	See term and condition A.2.h.
OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) shall not exceed 1.72 pounds per hour. See term and condition A.2.i and Section B.2.

OAC rule 3745-15-07(A)	See term and condition A.2.j and Section C.5.

2. Additional Terms and Conditions

2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) or particulate matter emissions 10 microns and less in diameter (PM10) from this air contaminant source because the calculated annual emission rate for PE and PM10 is less than ten tons per year, individually, taking into account the federally enforceable rule limit of 1.72 lb of PE per hour under OAC rule 3745-17-11(B). This is based upon the premise that all PM10 is considered to be PE.

2.b The total usage of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K004 (Miscellaneous Metal Parts Coating Line), P002 (Abrasive Blasting Enclosure), other deminimis air contaminant sources, as defined in OAC rule 3745-15-05 and other air contaminant sources exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit combined shall not exceed 9.9 tons per year (TPY)* for any single HAP, as a rolling, 12-month summation and 24.9 TPY* for any combination of HAPs, as a rolling, 12-month summation.

*This assumes that the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

The permittee has existing records to demonstrate compliance with this emissions limitation upon permit issuance.

2.c The volatile organic compound (VOC) emissions from emissions unit K004 (Miscellaneous Metal Parts Coating Line), including cleanup and cleaning solvent emissions, shall not exceed 89.32 TPY based upon a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emissions limitation upon permit issuance.

2.d The VOC content of zinc rich primer coatings employed in this emissions unit shall not exceed a daily volume-weighted average of 4.0 lbs per gallon, as applied, excluding water and exempt solvents.

2.e The VOC content of extreme performance coatings employed in this emissions unit shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

2.f The VOC content of coatings dried at temperatures not exceeding 200 degrees Fahrenheit employed in this emissions unit shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

2.g The VOC content of coatings employed in this emissions unit, that are not specified under terms A.2.d, A.2.e, and A.2.f above, shall not exceed a daily volume-weighted average of 3.0 lbs per gallon, as applied, excluding water and exempt solvents.

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

2.i The VOC emission limitation outlined in Section A.1 is equal to, and the particulate emissions limitation outlined in Section A.1 is greater than, the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with these hourly emission limitations.

2.j The particulate emissions from this emissions unit shall not cause a public nuisance, as defined in OAC rule 3745-15-07.

2.k The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the nitrogen oxide (NOx) and carbon monoxide (CO) emissions from this air contaminant source since the uncontrolled potential to emit for NOx and CO, individually, is less than ten tons per year.

2.l Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content and emission limitations.

B. Operational Restrictions

1. The total VOC input from coatings and cleanup/cleaning solvents employed in emissions unit K004 (Miscellaneous Metal Parts Coating Line) shall not exceed 89.32 tons per year (TPY). Compliance with the above limitation shall be based upon a rolling, 12 month-summation of the VOC input. The VOC input shall be determined by multiplying the number of gallons of each coating and cleanup/cleaning solvent

employed per month by the VOC content of each coating and cleanup/cleaning solvent, in pounds per gallon. The VOC input of coatings and cleanup/cleaning solvents shall be assumed to be 100 percent of the VOC content of the coatings and cleanup/cleaning solvents employed and, as such, is equivalent to the VOC emission rate.

2. The permittee shall operate the dry filtration system (fabric filters) whenever this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document any time periods when the dry filtration system (fabric filters) was not in service when the emissions unit was in operation.

2. The permittee shall collect and record the following information each day for this emissions unit:

   a. the name, identification number, and type (zinc rich, extreme performance, dried <200 degrees F, other) of each coating, as applied;

   b. the VOC content (excluding water and exempt solvents) of each coating, as applied;

   c. the number of gallons (excluding water and exempt solvents) of each coating, as applied;

   d. the daily VOC emissions from all the coatings employed, in pounds, [i.e., the sum of (b) times (c) for each coating employed]; and

   e. the daily volume-weighted average VOC content of all coatings used to show compliance with each of the following terms: A.2.d thru A.2.g, individually, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.

3. The permittee shall collect and record the following information each month for this emissions unit:

   a. the name and identification number of each coating and cleanup/cleaning solvent employed;

b. the VOC content for each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents;

c. the VOC content for each cleanup/cleaning solvent, in pounds of VOC per gallon of cleaning solvent;

d. the number of gallons of each coating employed, excluding water and exempt solvents;

e. the number of gallons of each cleanup/cleaning solvent employed;

f. the total VOC input/emissions in pounds or tons [summation of (b x d) for all coatings plus © x e) for all cleanup/cleaning solvents and divided by 2,000 pounds per ton if the units are in tons]; and

g. the updated rolling, 12-month summation of the total VOC input/emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.

4. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.b:

a. The name and identification number of each coating employed.

b. The individual HAP* content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied.

c. The total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].

d. The number of gallons of each coating employed.

e. The name and identification number of each cleanup/cleaning solvent employed.

f. The individual HAP content for each HAP of each cleaning solvent, in pounds of individual HAP per gallon of cleanup/cleaning solvent, as applied.

g. The total combined HAP content of each cleaning solvent, in pounds of combined HAPs per gallon of cleanup/cleaning solvent, as applied [sum all the individual HAP contents from (f)].

h. The number of gallons of each cleanup/cleaning solvent employed.

i. The total individual HAP usage** for each HAP from all coatings and cleanup/cleaning solvents employed, in pounds or tons [for each HAP, the sum of (b) times (d) for all coatings plus the sum of (f) times (h) for all cleanup/cleaning solvents, and divided by 2,000 pounds per ton if the units are in tons].

j. The total combined HAP usage** from all coatings and cleanup/cleaning solvents employed, in pounds or tons [the sum of (c) times (d) for all coatings plus the sum of (g) times (h) for all cleanup/cleaning solvents, and divided by 2,000 pounds per ton if the units are in tons].

k. The updated rolling, 12-month summation of usage for each individual HAP**, in tons. This shall include the information for the current month and the preceding eleven calendar months.

l. The updated rolling, 12-month summation of usage for the total combined HAPs**, in tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

** This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

5. The permittee shall develop, implement, and maintain a preventive maintenance and malfunction plan to minimize particulate emissions, during operation of this emissions unit, in such a manner as to prevent the emissions unit from causing a public nuisance.

   The preventive maintenance and malfunction plan and related records must be kept onsite and available for inspection during regular office hours.

6. The permit to install for this emissions unit K004 was evaluated based on the actual 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 to this

emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene
TLV (ug/m3): 75,360
Maximum Hourly Emission Rate (lbs/hr): 9.12
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,371
MAGLC (ug/m3): 1,794

7. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

   The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by

January 31 of each year and shall cover the previous calendar year.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the dry filtration system (fabric filters) was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the event occurs.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of each daily record showing a daily volume-weighted average coating VOC content greater than the limitations specified in terms and conditions A.2.d, A.2.e, A.2.f, or A.2.g, as applicable. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC input/emission limitation outlined in term and condition A.2.c and Section B.1. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.b. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

5. The permittee shall submit annual reports which specify the total VOC emissions, total individual HAP emissions, and total combined HAP emissions from emissions unit K004 for the previous calendar year. These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 168 pounds per hour, excluding cleanup and cleaning solvents.

Applicable Compliance Method:

The hourly VOC emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum spray coating application rate of 42 gallons per hour) x (4.0 lbs of VOC per gallon of coating as worst-case zinc rich primer).

b. Emission Limitation:

Particulate emissions (PE) shall not exceed 1.72 pounds per hour.

Applicable Compliance Method:

The hourly PE emission rate is based on Table I in OAC rule 3745-17-11.
To determine actual PE rate, the following equation shall be used:

E = maximum coating solids usage rate, in pounds per hour, x (1-TE) x (1-CE)

where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.40); and

CE = fractional control efficiency of the control equipment (blanket fabric filter) on the duplex coating spray station (0.997).

The permittee shall demonstrate that the permittee-supplied particulate emission factors and controlled mass rate of particulate emissions from the spray coating stations as provided in PTI application 14-05946, submitted May 14, 2007, are in compliance with the above emission limitation based upon the results of emission testing required in Section E.2 of this permit.

c. Emission Limitation:

89.32 TPY of VOC emissions from emissions unit K004, including cleanup and cleaning solvents, based on a rolling 12-month summation.

Applicable Compliance Method:

Compliance with the annual VOC emissions limitation in term and condition A.2.c shall be based upon the record keeping requirements as specified in section C.3.

d. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling 12-month summation for the emissions units listed in section A.2.b.

Applicable Compliance Method:

Compliance with the HAP emission limitations in term and condition A.2.b shall be demonstrated by the record keeping requirements specified in section C.4.

e. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

When requested, compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

f. Emission Limitations:

The VOC content of zinc rich primer coatings employed in this emissions unit shall not exceed a daily volume-weighted average of 4.0 lbs per gallon, as applied, excluding water and exempt solvents.

The VOC content of extreme performance coatings employed in this emissions unit shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

The VOC content of coatings dried at temperatures not exceeding 200 degrees Fahrenheit employed in this emissions unit shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

The VOC content of coatings employed in this emissions unit, that are not specified under terms A.2.d, A.2.e, and A.2.f, shall not exceed a daily volume-weighted average of 3.0 lbs per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

U.S. EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup and cleaning solvents.

g. Emission Limitation:

The controlled potential to emit for PE and PM10 is less than ten tons per year.

Applicable Compliance Method:

The annual PE-PM10 emission rate shall be calculated by multiplying the hourly PE emission rate in term E.1.b by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds/ton. All PM10 are assumed to be PE.

h. Emission Limitation:

The uncontrolled potential to emit for NOx and CO emissions is less than ten tons per year.

Emissions Unit ID: **K004**

Applicable Compliance Method:

The annual NOx and CO emission rates are based on this emissions unit's uncontrolled potential to emit from the combustion of natural gas in the surface pretreatment tank burners and drying ovens. The annual NOx and CO emission rates were calculated by the following equation:

E_{NOx} = total oven/burner heat input of 12.5 mmBtu/hour x 0.098 lbs NOx/mmBtu per AP-42 Table 1.4 x 8760 hours/(2000)]; and

E_{CO} = total oven/burner heat input of 12.5 mmBtu/hour x 0.082 lbs CO/mmBtu per AP-42 Table 1.4 x 8760 hours/(2000)];

where E = Emissions $Rate_{(Pollutant)}$ (tons per year)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

   a. The emission testing shall be conducted within 3 months after issuance of the permit.

   b. The emission testing shall be conducted to demonstrate that the controlled mass rate of particulate emissions from the duplex spray coating stations on the coating line are in compliance with the allowable particulate mass emissions rate, in pounds per hour.

   c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate:

      Methods 1 thru 5 of 40 CFR Part 60, Appendix A

      Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

   d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum coating application capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

   e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office

or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

F. Miscellaneous Requirements

1. The terms and conditions in this permit supersede air permit-to-install number 14-05358, as issued on November 19, 2002 for emissions unit K002, and air permit-to-install number 14-05779, as issued on April 6, 2006, for emissions units K001, K003, and P001. Emission units K001, K002, K003, and P001 have been consolidated into a single coating line identified as emissions unit K004 in this permit.

2. The following terms and conditions of this installation permit are federally enforceable: Sections A, B, C.1, C.2, C.3, C.4, C.5, D, and E.

Trans-Acc., Inc. / Hamilton **Facility ID: 1409040883**
PTI Application: 14-05946
Issued: 9/18/2007

Emissions Unit ID: **K004**

SIC CODE 3479 SCC CODE 4-02-025-01 EMISSIONS UNIT ID K004

EMISSIONS UNIT DESCRIPTION Miscellaneous Metal Parts Coating Line, consisting of surface pretreatment, three duplex spray coating application stations, a powder coating application station, and drying ovens connected by a monorail conveyor system.

DATE INSTALLED 1997, modified 2006

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.78 lbs/hr	1.87	1.72 lbs/hr	3.42
PM_{10}	nonattainment (as PM2.5)	0.78 lbs/hr	1.87	1.72 lbs/hr	3.42
Sulfur Dioxide	attainment		negl.		negl.
Organic Compounds	nonattainment	168 lbs/hr	27.74	168 lbs/hr	89.32 as rolling 12-month sum.
Nitrogen Oxides	attainment		2.94		5.37
Carbon Monoxide	attainment		2.46		4.49
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations, operational restrictions, and coating VOC content. Basis is PTE per the permittee-supplied operational parameters in the PTI application and compliance with the SIP VOC coating content limitations as contained in permittee's BAT study.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $0

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? XX YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: toluene (worst case) <80% of MAGLC