



12/17/2014

Jerry LaFayette
O'Gara-Hess & Eisenhardt Armoring Company LLC
9113 LESAINTE DR
FAIRFIELD, OH 45014

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1409030600
Permit Number: P0115815
Permit Type: Renewal
County: Butler

Certified Mail

Table with 2 columns: Status (No) and Item (TOXIC REVIEW, SYNTHETIC MINOR TO AVOID MAJOR NSR, CEMS, MACT/GACT, NSPS, NESHAPS, NETTING, MODELING SUBMITTED, SYNTHETIC MINOR TO AVOID TITLE V, FEDERALLY ENFORCABLE PTIO (FEPTIO), SYNTHETIC MINOR TO AVOID MAJOR GHG)

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](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

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

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777 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: SWOAQA



**FINAL**

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

**O'Gara-Hess & Eisenhardt Armoring Company LLC**

Facility ID:	1409030600
Permit Number:	P0115815
Permit Type:	Renewal
Issued:	12/17/2014
Effective:	12/17/2014
Expiration:	12/17/2024





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
O'Gara-Hess & Eisenhardt Armoring Company LLC

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## Authorization

Facility ID: 1409030600  
Application Number(s): A0049348  
Permit Number: P0115815  
Permit Description: Administrative modification being processed as a renewal permit for coating operation due to transition to True Minor facility.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 12/17/2014  
Effective Date: 12/17/2014  
Expiration Date: 12/17/2024  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

O'Gara-Hess & Eisenhardt Armoring Company LLC  
9113 LESAINTE DR  
FAIRFIELD, OH 45014

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:

Southwest Ohio Air Quality Agency  
250 William Howard Taft Rd.  
Cincinnati, OH 45219  
(513)946-7777

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**  
O'Gara-Hess & Eisenhardt Armoring Company LLC  
**Permit Number:** P0115815  
**Facility ID:** 1409030600  
**Effective Date:** 12/17/2014

## **Authorization (continued)**

Permit Number: P0115815

Permit Description: Administrative modification being processed as a renewal permit for coating operation due to transition to True Minor facility.

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

<b>Emissions Unit ID:</b>	<b>K011</b>
Company Equipment ID:	Booth 4
Superseded Permit Number:	P0105237
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
O'Gara-Hess & Eisenhardt Armoring Company LLC  
**Permit Number:** P0115815  
**Facility ID:** 1409030600  
**Effective Date:** 12/17/2014

## **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**  
O'Gara-Hess & Eisenhardt Armoring Company LLC  
**Permit Number:** P0115815  
**Facility ID:** 1409030600  
**Effective Date:** 12/17/2014

## **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.
2. The Ohio EPA has determined that this facility may be subject to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



**Final Permit-to-Install and Operate**  
O'Gara-Hess & Eisenhardt Armoring Company LLC  
**Permit Number:** P0115815  
**Facility ID:** 1409030600  
**Effective Date:** 12/17/2014

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



**1. K011, Booth 4**

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

Global Finishing Solutions Midwest/Rhino Paint Spray Booth 4

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)(8).

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Volatile organic compound (VOC) emissions shall not exceed 22.6 pounds per day and 4.12 tons per year (TPY), including cleanup material.  See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/1/2006	See b)(2)b.
c.	OAC rule 3745-17-11(C)	See c)(1) and c)(2).
d.	OAC rule 3745-21-09(U)	Exempt per OAC rule 3745-21-09(U)(2)(c).
e.	OAC rule 3745-21-18	See b)(2)c. and c)(3) through c)(6).

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code



(ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons per year.

- c. The following content of volatile organic compounds (VOC), as applied, for any coatings applied to mobile equipment or mobile equipment components, shall not be exceeded:

<b>Coating Type</b>	<b>Limit (pounds VOC per gallon of coating, excluding water and exempt solvents)</b>	<b>Limit (grams VOC per liter of coating, excluding water and exempt solvents)</b>
Pretreatment primer	6.5	780
Primer-surfacer	4.8	575
Primer-sealer	4.6	550
Topcoat (single-stage)	5.0	600
Topcoat (two-stage basecoat/clearcoat)	5.0	600
Topcoat (three or four-stage basecoat/clearcoat)	5.2	625
Multi-colored topcoat	5.7	680
Automotive specialty	7.0	840

- d. The daily emission limitation is based upon the emission unit's potential to emit. Therefore, no daily records are required to demonstrate compliance with this limitation.



c) Operational Restrictions

- (1) The permittee shall operate the 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.
- (3) The permittee shall use one or more of the following application techniques, in accordance with manufacturer's specifications, to apply any coating containing a VOC to mobile equipment for commercial purposes: flow or curtain coating, dip coating, roller coating, brush coating, cotton-tipped swab application, electro-deposition coating, high volume low pressure (HVLP) spraying, electrostatic spray, airless spray, air-assisted airless spray, and any other coating application method that the owner or operator of the facility demonstrates and Ohio EPA determines achieves emission reductions equivalent to HVLP or electrostatic spray application techniques.
- (4) The operators of paint application equipment shall be trained in the use of an HVLP sprayer, or equivalent application, in accordance with the manufacturer's specifications, and in the handling of a coating and any solvents used to clean the spray equipment.
- (5) Spray guns used to apply coatings shall be cleaned by one of the following:
  - a. in an enclosed spray gun cleaning system that remains closed at all times when not in use;
  - b. in a system that discharges nonatomized cleaning solvent into a waste container that remains closed when not in use;
  - c. in a reservoir that allows for disassembly and cleaning of application equipment and that is kept closed when not in use; and
  - d. in a system that atomizes cleaning solvent into a waste container that is fitted with a device designed to capture atomized solvent emissions.
- (6) The permittee shall store the following materials in non-absorbent, non-leaking containers and keep these containers closed at all times when not in use: fresh coatings, used coatings, solvents, VOC-containing additives and materials, VOC-containing waste materials, and cloth, paper, or absorbent applicators moistened with any of the items listed above.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following for this emissions unit:
  - a. the company identification of each coating and cleanup material employed;



- b. the identification of coating type (as referenced in b)(2)c.) of each coating employed;
- c. the number of gallons of each coating and cleanup material employed;
- d. the volatile organic compound (VOC) content of each coating and cleanup material employed, in pounds per gallon, as applied; and
- e. the total VOC emissions from this emissions unit, i.e., the sum of d)(1)c. x d)(1)d. for all coatings and cleanup materials employed, in pounds.

These monthly records shall be maintained for the purpose of determining annual VOC emissions for the emissions unit.

- (2) 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.
- (3) 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.
- (4) 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.
- (5) 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. the name of person who performed the inspection.

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

- (6) The permittee shall maintain records that document any time periods when the 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.

- (7) The permittee shall submit documentation sufficient to demonstrate that high efficiency transfer application techniques of coatings are in use at their facility and that all employees applying coatings are properly trained in the use of an HVLP sprayer, or equivalent application, and in the handling of a coating and any solvents used to clean the spray equipment. The permittee shall maintain a copy of this documentation on-site and make the documentation available to the Ohio EPA, or its representative, upon request.
- (8) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install and operate (PTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of all emissions in excess of the applicable VOC content limits. The notification shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance is discovered.
- (3) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

f) Testing Requirements

- (1) Compliance with the Emission 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 Limitations:

Volatile organic compound (VOC) emissions shall not exceed 22.6 pounds per day and 4.12 tons per year (TPY), including cleanup material.



Applicable Compliance Method:

The daily emission limitation is based upon the emissions unit's potential to emit. Potential VOC emissions were determined based on the following equation from the permittee-supplied information in the application for PTIO P0115815 as submitted on November 18, 2013:

$$\text{VOC} = [(3.0 \text{ gallons Rhino coating/vehicle worst case}) \times (1.85 \text{ pounds VOC/gallon, VOC content for Rhino coating}) \times (3 \text{ vehicles/day maximum})] + [(0.5 \text{ gallon Sealer/vehicle worst case}) \times (3.5 \text{ pounds VOC/gallon, VOC content for Sealer}) \times (3 \text{ vehicles/day maximum})] + [(0.10 \text{ gallon/day cleanup solvent}) \times (6.5 \text{ pounds VOC/gallon, VOC content cleanup solvent})] = 22.6 \text{ pounds per day.}$$

The annual emission limitation is based upon the emissions unit's potential to emit. Potential VOC emissions were determined based on the following equation from the permittee-supplied information in the application for PTIO P0115815 as submitted on November 18, 2013:

$$\text{VOC} = ((3.0 \text{ gallons Rhino coating/vehicle worst case}) \times (1.85 \text{ pounds VOC/gallon, VOC content for Rhino coating}) \times (3 \text{ vehicles/day maximum}) + [(0.5 \text{ gallon Sealer/vehicle worst case}) \times (3.5 \text{ pounds VOC/gallon, VOC content for Sealer}) \times (3 \text{ vehicles/day maximum})] + [(0.10 \text{ gallon/day cleanup solvent}) \times (6.5 \text{ pounds VOC/gallon, VOC content cleanup solvent})]) \times (365 \text{ days/year}) / (2000 \text{ pounds/ton}) = 4.12 \text{ TPY.}$$

Compliance with the annual VOC emission limitation in b)(1)a. shall be determined by the record keeping in d)(1).

b. Emission Limitations:

VOC content limitations in b)(2)c. for various types of coatings.

Applicable Compliance Method:

Except for multi-stage topcoats, the mass of VOC per combined volume of VOC and coating solids, excluding water and exempt solvents, shall be calculated by the following equation:

$$\text{VOC} = (W_V - W_W - W_{EC}) / (V - V_W - V_{EC})$$

where:

VOC = VOC content in pounds per gallon of coating, excluding water and exempt solvents;

$W_V$  = mass of total volatiles, in pounds;

$W_W$  = mass of water, in pounds;

$W_{EC}$  = mass of exempt solvents, in pounds;



$V$  = volume of coating, in gallons;

$V_w$  = volume of water, in gallons; and

$V_{EC}$  = volume of exempt solvents, in gallons.

The VOC content of a multi-stage topcoat shall be calculated by the following equation:

$$VOC_{multi} = \frac{VOC_{bc} + \sum_{i=0}^M VOC_{mci} + 2(VOC_{cc})}{M + 3}$$

where:

$VOC_{multi}$  = VOC content of multistage topcoat, in pounds per gallon, excluding water and exempt solvents;

$VOC_{bc}$  = VOC content of basecoat, in pounds per gallon, excluding water and exempt solvents;

$VOC_{mci}$  = VOC content of each midcoat(s), in pounds per gallon, excluding water and exempt solvents;

$VOC_{cc}$  = VOC content of the clear coat, in pounds per gallon, excluding water and exempt solvents; and

$M$  = number of midcoats.

(The VOC content of each coating shall be measured in accordance with USEPA Method 24.)

g) Miscellaneous Requirements

- (1) None.