



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
CLERMONT COUNTY**

CERTIFIED MAIL

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: 14-05920

Fac ID: 1413020501

DATE: 10/23/2007

Victory Custom Trailers, Inc.
Dale Freeman
4160 Half Acre Road
Batavia, OH 45103-0000

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, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

HCDES



**Permit To Install
Terms and Conditions**

**Issue Date: 10/23/2007
Effective Date: 10/23/2007**

FINAL PERMIT TO INSTALL 14-05920

Application Number: 14-05920
Facility ID: 1413020501
Permit Fee: **\$1200**
Name of Facility: Victory Custom Trailers, Inc.
Person to Contact: Dale Freeman
Address: 4160 Half Acre Road
Batavia, OH 45103-0000

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4160 Half Acre Road
Batavia, Ohio**

Description of proposed emissions unit(s):
Permit to install application has been applied for the installation of three (3) miscellaneous metal parts paint spray booths.

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

Victory Custom Trailers, Inc.
PTI Application: 14-05920
Issued: 10/23/2007

Facility ID: 1413020501

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

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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)

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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.

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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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	62.16

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 -(K001) - Miscellaneous metal parts paint spray booth 1 (Large booth)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 10.5 pounds per hour from coatings application.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-21-09(U)(1)(c).</p>
OAC rule 3745-31-05(C) (to avoid being subject to non-attainment new source review and Title V permitting requirements)	<p>The VOC emissions shall not exceed 20.72 tons per year (TPY), based on a rolling, 12-month summation, from coatings application and cleaning material usage (parts cleaning prior to coating and post-coating cleanup).</p> <p>See terms and conditions B.1 and B.2.</p>
OAC rule 3745-21-09(U)(1)(c)	<p>The permittee shall not cause, allow or permit the discharge into the ambient air of any VOC from this emissions unit in excess of 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied, for an extreme performance coating.</p>

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of coatings that comply with the requirements of OAC rule 3745-21-09(U)(1)(c), compliance with the short-term VOC emission limitations and VOC content limitation for cleaning material employed, and compliance with the rolling, 12-month coating and cleaning material usage limitations, and rolling, 12-month VOC emission limitation.

Issued: 10/23/2007

- 2.b** The hourly emission limitation outlined in term A.1 is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 6240 gallons per year, excluding water and exempt solvents, as applied, based on a rolling, 12-month summation and the maximum annual cleaning material usage (as evaporated) for this emissions unit shall not exceed 2800 gallons per year, based on a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating or cleaning material usage levels, in gallons excluding water and exempt solvent, as applied, specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage Usage</u>	<u>Maximum Allowable Cumulative Solvent</u>
1	520	233
1-2	1040	467
1-3	1560	700
1-4	2080	933
1-5	2600	1167
1-6	3120	1400
1-7	3640	1633
1-8	4160	1867
1-9	4680	2100
1-10	5200	2333
1-11	5720	2567
1-12	6240	2800

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating and cleaning material usage limitations shall be based upon rolling, 12-month summations of the coating and cleaning material usage figures.

2. The VOC content, as applied, of each cleaning material employed shall not exceed 7.0 pounds of VOC per gallon.

C. Monitoring and/or Recordkeeping Requirements

1. 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 cleaning material employed;
 - b. The VOC content for each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents as applied;
 - c. The VOC content for each cleaning material, in pounds of VOC per gallon of cleaning material;
 - d. The number of gallons of each coating employed, excluding water and exempt solvents as applied;
 - e. The number of gallons of each cleaning material employed (as evaporated);
 - f. The total VOC emissions in pounds or tons [summation of, (b x d) for all coatings plus c x e) for all cleaning materials, and divided by 2,000 pounds per ton if the units are in pounds];
 - g. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coating and cleaning material usage, in gallons. This shall include the information for the current month and the preceding eleven calendar months.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative coating and cleaning material usages for each calendar month; and

- h. Beginning during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit and continuing thereafter, the updated rolling, 12-month summation of the total VOC emissions, in tons. This shall include the information for the current month and the preceding calendar months for 12 calendar months as the time unit of measure is based upon a rolling, 12-month summation of the total VOC emissions, in tons.

Issued: 10/23/2007

2. The permit to install for emissions units K001 through K003 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust systems, 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 these emissions units 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): 188,400

Maximum Hourly Emission Rate (lbs/hr): 31.5 lbs/hr, K001 - K003, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2025 for emissions units K001 - K003, combined

MAGLC (ug/m3): 4485

3. 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.).

D. Reporting Requirements

1. 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.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitations on coating usage and/or cleaning material usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage and/or cleaning material usage levels. If no exceedances occurred during the reporting period, the permittee shall state so in the report. These reports shall be submitted to the Hamilton County Department of Environmental Services in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emission limitation. If no exceedances occurred during the reporting period, the permittee shall state so in the report. These reports shall be submitted to the Hamilton County Department of Environmental Services in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that describe any changes to this emissions unit which affect the air toxic modeling as outlined in C.3. above. 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.
5. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

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

Issued: 10/23/2007

- a. Emission Limitation:
The volatile organic compounds (VOC) emissions from this emissions unit shall not exceed 10.5 pounds per hour from coatings application.

Applicable Compliance Method:

In the application for air PTI 14-05920, submitted February 7, 2007, the permittee provided the basis for the calculation which was used to determine that the potential to emit for VOC, considering the use of compliant coatings pursuant to OAC rule 3745-21-09(U)(1)(c), is:

3.5 pounds of VOC/gallon coating, excluding water and exempt solvents, as applied, x 3 gallons coating applied/hour = 10.5 pounds per hour of VOC emissions.

- b. Emission Limitation:
The VOC emissions shall not exceed 20.72 TPY, based on a rolling, 12-month summation, from coatings application and cleanup material usage.

Applicable Compliance Method:

In the application for PTI 14-05920, submitted February 7, 2007, the permittee provided the basis for the calculations which were used to determine that the potential to emit for VOC, considering the use of compliant coatings pursuant to OAC rule 3745-21-09(U)(1)(c) and considering the rolling, 12-month coating and cleaning material usage limitations is:

3.5 pounds of VOC/gallon coating, excluding water and exempt solvents, as applied, x 6240 gallons coating applied/rolling, 12-months x 1 Ton/2000 pounds = 10.92 TPY of VOC emissions;

1500 gallons cleaning material (evaporated) for parts cleaning prior to coating/rolling, 12-months;

1500 gallons cleaning material for post-coating cleanup/rolling, 12-months - (800 gallons solvent waste disposed/rolling, 12-months x 0.25 gal solvent/gal solvent waste) = 1300 gallons cleaning material (evaporated) for post-coating cleanup/rolling, 12-months; and

7.0 pounds of VOC/gallon cleaning material x 2800 gallons cleaning material (evaporated)/rolling, 12-months x 1 Ton/2000 pounds = 9.80 TPY of VOC

Emissions Unit ID: **K001**

emissions.

The summation of 10.92 TPY + 9.80 TPY = 20.72 TPY of VOC per rolling, 12-months.

Compliance with the TPY of VOC emission limitation shall be demonstrated by the record keeping requirements in term and condition C.1.

In calculating the actual emissions, the permittee may take a 50% emissions reduction credit for storing rags, used in parts cleaning prior to coating, in closed containers. Also, in calculating the actual emissions, the permittee may take credit for any volume of cleaning material solvent waste disposed of as outlined above.

c. Emission Limitation:

The permittee shall not cause, allow or permit the discharge into the ambient air of any VOC from this emissions unit in excess of 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied, for an extreme performance coating.

Applicable Compliance Method:

USEPA methods 24 and 24A shall be used to determine the VOC content for coatings. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A 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 or 24A.

d. Emission Limitation:

The VOC content, as applied, of each cleanup material employed shall not exceed 7.0 pounds of VOC per gallon.

Applicable Compliance Method:

USEPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

2. Compliance with the usage limitations in term and condition B.1 shall be demonstrated by the record keeping required in term and condition C.1.

F. Miscellaneous Requirements

Issued: 10/23/2007

1. The following terms and conditions of this permit to install are federally enforceable: A, B, C.1, D.1, D.2, and E.

Issued: 10/23/2007

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 - (K002) - Miscellaneous metal parts paint spray booth 2 (Medium booth)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 10.5 pounds per hour from coatings application.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-21-09(U)(1)(c).</p>
OAC rule 3745-31-05(C) (to avoid being subject to Title V permitting requirements)	<p>The VOC emissions shall not exceed 20.72 tons per year (TPY), based on a rolling, 12-month summation, from coatings application and cleaning material usage (parts cleaning prior to coating and post-coating cleanup).</p> <p>See terms and conditions B.1 and B2.</p>
OAC rule 3745-21-09(U)(1)(c)	<p>The permittee shall not cause, allow or permit the discharge into the ambient air of any VOC from this emissions unit in excess of 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied, for an extreme performance coating.</p>

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of coatings that comply with the requirements of OAC rule 3745-21-09(U)(1)(c), compliance with the short-term VOC emission limitations and VOC content limitation for cleaning material employed, and compliance with the rolling, 12-month coating and cleaning material usage limitations, and rolling, 12-month VOC emission limitation.

- 2.b** The hourly emission limitation outlined in term A.1 is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 6240 gallons per year, excluding water and exempt solvents, as applied, based on a rolling, 12-month summation and the maximum annual cleaning material usage (as evaporated) for this emissions unit shall not exceed 2800 gallons per year, based on a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating or cleaning material usage levels, in gallons excluding water and exempt solvent, as applied, specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage</u>	<u>Maximum Allowable Cumulative Solvent</u>
	<u>Usage</u>	
1	520	233
1-2	1040	467
1-3	1560	700
1-4	2080	933
1-5	2600	1167
1-6	3120	1400
1-7	3640	1633
1-8	4160	1867
1-9	4680	2100
1-10	5200	2333
1-11	5720	2567
1-12	6240	2800

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating and cleaning material usage limitations shall be based upon rolling, 12-month summations of the coating and cleaning material usage figures.

2. The VOC content, as applied, of each cleaning material employed shall not exceed 7.0 pounds of VOC per gallon.

Issued: 10/23/2007

C. Monitoring and/or Recordkeeping Requirements

1. 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 cleaning material employed;
 - b. The VOC content for each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents as applied;
 - c. The VOC content for each cleaning material, in pounds of VOC per gallon of cleaning material;
 - d. The number of gallons of each coating employed, excluding water and exempt solvents as applied;
 - e. The number of gallons of each cleaning material employed (as evaporated);
 - f. The total VOC emissions in pounds or tons [summation of, (b x d) for all coatings plus c x e) for all cleaning materials, and divided by 2,000 pounds per ton if the units are in pounds];
 - g. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coating and cleaning material usage, in gallons. This shall include the information for the current month and the preceding eleven calendar months.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative coating and cleaning material usages for each calendar month; and

- h. Beginning during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit and continuing thereafter, the updated rolling, 12-month summation of the total VOC emissions, in tons. This shall include the information for the current month and the preceding calendar months for 12 calendar months as the time unit of measure is based upon a rolling, 12-month summation of the total VOC emissions, in tons.

Emissions Unit ID: **K002**

2. The permit to install for emissions units K001 through K003 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust systems, 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 these emissions units 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): 188,400

Maximum Hourly Emission Rate (lbs/hr): 31.5 lbs/hr, K001 - K003, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2025 for emissions units K001 - K003, combined

MAGLC (ug/m3): 4485

3. 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.).

D. Reporting Requirements

1. 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.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitations on coating usage and/or cleaning material usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage and/or cleaning material usage levels. If no exceedances occurred during the reporting period, the permittee shall state so in the report. These reports shall be submitted to the Hamilton County Department of Environmental Services in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emissions limitation. If no exceedances occurred during the reporting period, the permittee shall state so in the report. These reports shall be submitted to the Hamilton County Department of Environmental Services in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that describe any changes to this emissions unit which affect the air toxic modeling as outlined in C.3. above. 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.
5. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

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

Victory Custom Trailers, Inc.

PTI Application: 14-05920

Facility ID: 1413020501

Emissions Unit ID: **K002**

- a. Emission Limitation:
The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 10.5 pounds per hour from coatings application.

Applicable Compliance Method:

In the application for PTI 14-05920, submitted February 7, 2007, the permittee provided the basis for the calculation which was used to determine that the potential to emit for VOC, considering the use of compliant coatings pursuant to OAC rule 3745-21-09(U)(1)(c), is:

3.5 pounds of VOC/gallon coating, excluding water and exempt solvents, as applied, x 3 gallons coating applied/hour = 10.5 pounds per hour of VOC emissions.

- b. Emission Limitation:
The VOC emissions shall not exceed 20.72 tons per year (TPY), based on a rolling, 12-month summation, from coatings application and cleanup material usage.

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Applicable Compliance Method:

In the application for PTI 14-05920, submitted February 7, 2007, the permittee provided the basis for the calculations which were used to determine that the potential to emit for VOC, considering the use of compliant coatings pursuant to OAC rule 3745-21-09(U)(1)(c) and considering the rolling, 12-month coating and cleaning material usage limitations is:

3.5 pounds of VOC/gallon coating, excluding water and exempt solvents, as applied, x 6240 gallons coating applied/rolling, 12-months x 1 Ton/2000 pounds = 10.92 TPY VOC emissions;

1500 gallons cleaning material (evaporated) for parts cleaning prior to coating/rolling, 12-months;

1500 gallons cleaning material for post-coating cleanup/rolling, 12-months - (800 gallons solvent waste disposed/rolling, 12-months x 0.25 gal solvent/gal solvent waste) = 1300 gallons cleaning material (evaporated) for post-coating cleanup/rolling, 12-months; and

7.0 pounds of VOC/gallon cleaning material x 2800 gallons cleaning material (evaporated)/rolling, 12-months x 1 Ton/2000 pounds = 9.80 TPY of VOC emissions.

The summation of 10.92 TPY + 9.80 TPY = 20.72 TPY of VOC per rolling, 12-months.

Compliance with the TPY VOC emission limitation shall be demonstrated by the record keeping requirements in term and condition C.1.

In calculating the actual emissions, the permittee may take a 50% emissions reduction credit for storing rags, used in parts cleaning prior to coating, in closed containers. Also, in calculating the actual emissions, the permittee may take credit for any volume of cleaning material solvent waste disposed of as outlined above.

c. Emission Limitation:

The permittee shall not cause, allow or permit the discharge into the ambient air of any VOC from this emissions unit in excess of 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied, for an extreme performance coating

Issued: 10/23/2007

Applicable Compliance Method:

USEPA methods 24 and 24A shall be used to determine the VOC content for coatings. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A 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 or 24A.

d. Emission Limitation:

The VOC content, as applied, of each cleanup material employed shall not exceed 7.0 pounds of VOC per gallon.

Applicable Compliance Method:

USEPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

2. Compliance with the usage limitations in term and condition B.1 shall be demonstrated by the record keeping required in term and condition C.1.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit to install are federally enforceable: A, B, C.1, D.1, D.2, D.3 and E.

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 - (K003) - Miscellaneous metal parts paint spray booth 3 (Small booth)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 10.5 pounds per hour from coatings application.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-21-09(U)(1)(c).</p>
OAC rule 3745-31-05(C) (to avoid being subject to Title V permitting requirements)	<p>The VOC emissions shall not exceed 20.72 tons per year (TPY), based on a rolling, 12-month summation, from coatings application and cleaning material usage (parts cleaning prior to coating and post-coating cleanup).</p> <p>See terms and conditions B.1 and B.2.</p>
OAC rule 3745-21-09(U)(1)(c)	The permittee shall not cause, allow or permit the discharge into the ambient air of any VOC from this emissions unit in excess of 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied, for an extreme performance coating.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of coatings that comply with the requirements of OAC rule 3745-21-09(U)(1)(c), compliance with the short-term VOC emission limitations and the VOC content limitation for cleaning material employed, and compliance with the rolling, 12-month coating and cleaning material usage limitations, and rolling, 12-month VOC emission limitation.

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- 2.b** The hourly emission limitation outlined in term A.1 is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 6240 gallons per year, excluding water and exempt solvents, as applied, based on a rolling, 12-month summation and the maximum annual cleaning material usage (as evaporated) for this emissions unit shall not exceed 2800 gallons per year, based on a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating or cleaning material usage levels, in gallons excluding water and exempt solvent, as applied, specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage Usage</u>	<u>Maximum Allowable Cumulative Solvent</u>
1	520	233
1-2	1040	467
1-3	1560	700
1-4	2080	933
1-5	2600	1167
1-6	3120	1400
1-7	3640	1633
1-8	4160	1867
1-9	4680	2100
1-10	5200	2333
1-11	5720	2567
1-12	6240	2800

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating and cleaning material usage limitations shall be based upon rolling, 12-month summations of the coating and cleaning material usage figures.

2. The VOC content, as applied, of each cleaning material employed shall not exceed 7.0 pounds of VOC per gallon.

Issued: 10/23/2007**C. Monitoring and/or Record keeping Requirements**

1. 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 cleaning material employed;
 - b. The VOC content for each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents as applied;
 - c. The VOC content for each cleaning material, in pounds of VOC per gallon of cleaning material;
 - d. The number of gallons of each coating employed, excluding water and exempt solvents as applied;
 - e. The number of gallons of each cleaning material employed (as evaporated);
 - f. The total VOC emissions in pounds or tons [summation of, (b x d) for all coatings plus c x e) for all cleaning materials, and divided by 2,000 pounds per ton if the units are in pounds];
 - g. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coating and cleaning material usage, in gallons. This shall include the information for the current month and the preceding eleven calendar months.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative coating and cleaning material usages for each calendar month; and

- h. Beginning during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit and continuing thereafter, the updated rolling, 12-month summation of the total VOC emissions, in tons. This shall include the information for the current month and the preceding calendar months for 12 calendar months as the time unit of measure is based upon a rolling, 12-month summation of the total VOC emissions, in tons.

Emissions Unit ID: **K003**

2. The permit to install for emissions units K001 through K003 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust systems, 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 these emissions units 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):

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Pollutant: toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 31.5 lbs/hr, K001 - K003, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2025 for emissions units K001 - K003, combined

MAGLC (ug/m3): 4485

3. 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.).

D. Reporting Requirements

1. 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.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitations on coating usage and/or cleaning

Emissions Unit ID: **K003**

material usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage and/or cleaning material usage levels. If no exceedances occurred during the reporting period, the permittee shall state so in the report. These reports shall be submitted to the Hamilton County Department of Environmental Services in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emissions limitation. If no exceedances occurred during the reporting period, the permittee shall state so in the report. These reports shall be submitted to the Hamilton County Department of Environmental Services in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that describe any changes to this emissions unit which affect the air toxic modeling as outlined in C.3. above. 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.
5. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations specified in Section A of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 10.5 pounds per hour from coatings application.

Applicable Compliance Method:
In the application for PTI 14-05920, submitted February 7, 2007, the permittee provided the basis for the calculation which was used to determine that the potential to emit for VOC, considering the use of compliant coatings pursuant to OAC rule 3745-21-09(U)(1)(c), is:

3.5 pounds of VOC/gallon coating, excluding water and exempt solvents, as

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applied, x 3 gallons coating applied/hour = 10.5 pounds per hour of VOC emissions

- b. Emission Limitation:
The VOC emissions shall not exceed 20.72 tons per year (TPY), based on a rolling, 12-month summation, from coatings application and cleanup material usage.

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Applicable Compliance Method:

In the application for PTI 14-05920, submitted February 7, 2007, the permittee provided the basis for the calculations which were used to determine that the potential to emit for VOC, considering the use of compliant coatings pursuant to OAC rule 3745-21-09(U)(1)(c) and considering the rolling, 12-month coating and cleaning material usage limitations is:

3.5 pounds of VOC/gallon coating, excluding water and exempt solvents, as applied, x 6240 gallons coating applied/rolling, 12-months x 1 Ton/2000 pounds = 10.92 TPY of VOC emissions;

1500 gallons cleaning material (evaporated) for parts cleaning prior to coating/rolling, 12-months;

1500 gallons cleaning material for post-coating cleanup/rolling, 12-months - (800 gallons solvent waste disposed/rolling, 12-months x 0.25 gal solvent/gal solvent waste) = 1300 gallons cleaning material (evaporated) for post-coating cleanup/rolling, 12-months; and

7.0 pounds VOC/gallon cleaning material x 2800 gallons cleaning material (evaporated)/rolling, 12-months x 1 Ton/2000 pounds = 9.80 TPY of VOC emissions.

The summation of 10.92 TPY + 9.80 TPY = 20.72 TPY of VOC per rolling, 12-months.

Compliance with the TPY VOC emissions limitation shall be demonstrated by the record keeping requirements in term and condition C.1.

In calculating the actual emissions, the permittee may take a 50% emissions reduction credit for storing rags, used in parts cleaning prior to coating, in closed containers. Also, in calculating the actual emissions, the permittee may take credit for any volume of cleaning material solvent waste disposed of as outlined above.

c. Emission Limitation:

The permittee shall not cause, allow or permit the discharge into the ambient air of any VOC from this emissions unit in excess of 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied, for an extreme performance coating

Applicable Compliance Method:

USEPA methods 24 and 24A shall be used to determine the VOC content for coatings. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A 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 or 24A.

d. Emission Limitation:

The VOC content, as applied, of each cleanup material employed shall not exceed 7.0 pounds of VOC per gallon.

Applicable Compliance Method:

USEPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

2. Compliance with the usage limitations in term and condition B.1 shall be demonstrated by the record keeping required in term and condition C.1.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit to install are federally enforceable: A, B, C.1, D.1, D.2, D.3 and E.