



12/30/2014

Tom Himes
ALL AMERICAN SPORTS CORP
669 Sugar Lane
Elyria, OH 44035

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0247040955
Permit Number: P0118120
Permit Type: Initial Installation
County: Lorain

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Chronicle Telegram. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street Suite 700
PO Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA-NEDO; Canada



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

This facility is sports equipment reconditioning facility. The facility reconditions and coats plastic helmets.

This permit is an initial Federally Enforceable PTIO for the installation of two new paint booths (R008 and R009), two new hydrographics stations (R010 and R011), and already installed sanding and buffing operations (P001). Emissions from units R008, R009, R010, and R011 are controlled with a passive filter. Emissions from P001 are controlled with a baghouse.

3. Facility Emissions and Attainment Status:

Lorain County is currently in non-attainment for ozone (2008 standard of 0.075 ppm). The county is in attainment for all other criteria pollutants.

The maximum annual materials usages (such as coatings, cleanup materials, and thinners) for the coatings spray booth emission units (R001, R002, R004, R005, R006, R007, R008, R009, R010, and R011) shall not exceed 19,600 gallons, combined, based upon a rolling, 12-month summation of the materials usage rates. This limitation restricts OC and HAP emissions.

Facility-wide Hazardous Air Pollutant (HAP) emissions are restricted to 9.9 tons/yr for any individual HAP and 24.9 tons/yr for any combined HAPs. The facility emission limits shall include emission from the following emissions units: R001, R002, R004, R005, R006, R007, R008, R009, R010, and R011.

4. Source Emissions:

This permit limits particulate emissions from P001 by requiring the installation of a baghouse with a design control efficiency of at least 99% control. OC emissions from R008 and R009 are limited to 0.50 ton/month, averaged over a 12-month rolling period. In addition, OC emission from R010 and R011 are limited to 0.18 ton/month, averaged over a 12-month rolling period.

5. Conclusion:

The potential to emit OC/HAP has been restricted by limiting the facility-wide annual materials usages to 19,600 gallons. Therefore, this facility is a synthetic minor/FEPTIO, and is not subject to the Title V permitting requirements. Record keeping requirements for the rolling, 12-month summation of materials usage and the OC ton/month averaged over a 12-month rolling period will ensure the facility stays below the limits in this permit.



6. Please provide additional notes or comments as necessary:

Emissions units R008 and R009 are exempt from the emission limitation requirements of OAC rule 3745-17-11(B)(1) and 3745-17-11(C) pursuant to OAC rule 3745-17-11(A)(1)(k) because hand held cup spray guns are employed.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
HAP (individual)	9.9
HAP (combined)	24.9
OC	8.16

PUBLIC NOTICE

12/30/2014 Issuance of Draft Air Pollution Permit-To-Install and Operate

ALL AMERICAN SPORTS CORP
ALL-AMERICAN SPORTS CORP, 669 SUGAR LANE
ELYRIA, OH 44035

Lorain County

FACILITY DESC.: Sporting and Athletic Goods Manufacturing, Sporting and Recreational Goods and Supplies
Merchant Wholesalers

PERMIT #: P0118120

PERMIT TYPE: Initial Installation

PERMIT DESC: Initial Federally Enforceable PTIO for the installation of two paint booths (R008 and R009), two hydrographics stations (R010 and R011), and already-installed sanding and buffing operations (P001) at a sports equipment reconditioning facility.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Edwin Perez, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
ALL AMERICAN SPORTS CORP**

Facility ID:	0247040955
Permit Number:	P0118120
Permit Type:	Initial Installation
Issued:	12/30/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
ALL AMERICAN SPORTS CORP

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Draft Permit-to-Install and Operate

ALL AMERICAN SPORTS CORP

Permit Number: P0118120

Facility ID: 0247040955

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0247040955

Application Number(s): A0052258

Permit Number: P0118120

Permit Description: Initial Federally Enforceable PTIO for the installation of two paint booths (R008 and R009), two hydrographics stations (R010 and R011), and already-installed sanding and buffing operations (P001) at a sports equipment reconditioning facility.

Permit Type: Initial Installation

Permit Fee: \$1,200.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 12/30/2014

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

ALL AMERICAN SPORTS CORP
ALL-AMERICAN SPORTS CORP
669 SUGAR LANE
ELYRIA, OH 44035

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

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Authorization (continued)

Permit Number: P0118120

Permit Description: Initial Federally Enforceable PTIO for the installation of two paint booths (R008 and R009), two hydrographics stations (R010 and R011), and already-installed sanding and buffing operations (P001) at a sports equipment reconditioning facility.

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

Emissions Unit ID:	P001
Company Equipment ID:	Sanding & Buffing Operations
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Hydrographics Stations

Emissions Unit ID:	R010
Company Equipment ID:	Hydrographics Station #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R011
Company Equipment ID:	Hydrographics Station #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Paint Booths

Emissions Unit ID:	R008
Company Equipment ID:	Paint Booth #8
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R009
Company Equipment ID:	Paint Booth #9
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
ALL AMERICAN SPORTS CORP
Permit Number: P0118120
Facility ID: 0247040955
Effective Date: To be entered upon final issuance

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 Ohio EPA DAPC, Northeast District Office 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.



Draft Permit-to-Install and Operate

ALL AMERICAN SPORTS CORP

Permit Number: P0118120

Facility ID: 0247040955

Effective Date: To be entered upon final issuance

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) c)(1), c)(2), d)(1), d)(2) and d)(3)

c) 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(D) (Synthetic Minor to avoid Title V and MACT)	See c)(2).

(2) Additional Terms and Conditions

a. The maximum annual Hazardous Air Pollutant (HAP) emissions generated at this facility (see c)(2)b) shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any total combined HAPs, based on a rolling, 12-month summation of emissions.

b. The facility-wide emission limitations shall include emissions from the following emissions units: R001, R002, R004, R005, R006, R007, R008, R009, R010 and R011.

d) Operational Restrictions

(1) The maximum annual individual HAP material usage for the facility (see c)(2)b) shall not exceed 9.9 tons, based upon a rolling, 12-month summation of the volatile organic material usage figures.



- (2) The maximum annual combined HAP material usage for the facility (see c)(2)b) shall not exceed 24.9 tons, based upon a rolling, 12-month summation of the volatile organic material usage figures.
- (3) The maximum annual materials usage for the emissions units identified in c)(2)b) shall not exceed 19,600 gallons, based upon a rolling, 12-month summation of the coating usage figures. 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 materials usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	1,634 gallons
1-2	3,268 gallons
1-3	4,902 gallons
1-4	6,536 gallons
1-5	8,169 gallons
1-6	9,802 gallons
1-7	11,435 gallons
1-8	13,068 gallons
1-9	14,701 gallons
1-10	16,334 gallons
1-11	17,967 gallons
1-12	19,600 gallons

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual materials usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

e) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for the emissions units identified in c)(2)b):
 - a. the rolling, 12-month individual HAP emissions for each HAP, in tons;
 - b. the rolling, 12-month total combined HAP emissions, in tons; and



c. the rolling, 12-month materials usage, in gallons.

f) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit quarterly deviation (excursion) reports for the following emissions unit(s) that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

<u>Emissions unit ID</u>	<u>Term & Condition</u>
R001, R002, R004 - R011	d)(1), d)(2) and d)(3)

- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions);
- d. the magnitude and duration of each deviation (excursion); and
- e. all exceedances of the rolling, 12-month limitation on materials 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 materials usage levels.

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and



October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (Ohio EPA Northeast District Office).

g) Testing Requirements

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

a. Emission Limitations:

The maximum annual HAP emissions generated at this facility (see c)(2)b) shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any total combined HAPs, based on a rolling, 12-month summation of emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based on the operational restrictions specified in d)(3) and the record keeping requirements specified in e)(1).

h) Miscellaneous Requirements

(1) None.



Draft Permit-to-Install and Operate
ALL AMERICAN SPORTS CORP
Permit Number: P0118120
Facility ID: 0247040955
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P001, Sanding & Buffing Operations

Operations, Property and/or Equipment Description:

Sanding and buffing of plastic helmets, controlled with a filter and baghouse; Includes 20 orbital sanding stations and 10 buffing wheel stations.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

a. None.

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

a. 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)	The permittee shall install a baghouse with a design control efficiency of at least 99% control of particulate emissions (PE). See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from this air contaminant source since the potential to emit is less than 10 tons/yr. See b)(2)b.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
d.	OAC rule 3746-17-11(B) Figure II	PE shall not exceed 2.3 pounds per hour.

(2) Additional Terms and Conditions

- a. This BAT design control efficiency applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c) Operational Restrictions

- a. The emissions from this emissions unit shall be vented to a baghouse at all times the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The acceptable range for the pressure drop across the baghouse shall be based upon the manufacturer's specifications, until such time as any required performance testing is conducted and an alternative pressure drop range and/or limit is established.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:



- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (3) The permittee shall properly install, operate and maintain the baghouse in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s).
- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, and/or operating manual(s) for the baghouse. These documents shall be maintained at the facility and shall be made available to the Ohio EPA District Office or Local Air Agency upon request.



- (5) The permittee shall maintain the following information for maintenance and repairs performed on the baghouse:
 - a. the date of the maintenance and/or repair;
 - b. a description of the maintenance and/or repairs performed; and
 - c. the name of person(s) who performed the maintenance and/or repair.

- e) Reporting Requirements
 - (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
 - (3) The permittee shall identify in the annual PER the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;



- d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

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

- a. Design Control Efficiency:

The permittee shall install a baghouse with a design control efficiency of at least 99% control of PE.

Applicable Compliance Method:

Compliance with the baghouse control efficiency shall be demonstrated by the record keeping requirements as established in section d) of this permit.

- b. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emission limitation shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

- c. Emission Limitation:

PE shall not exceed 2.3 pounds per hour.

Applicable Compliance Method:

If required, compliance with the hourly emission limitation shall be demonstrated by performing an emission test in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(8).

g) Miscellaneous Requirements

- (1) Emissions unit P001 was installed 6/1/1999.



2. Emissions Unit Group -Paint Booths: R008, R009

EU ID	Operations, Property and/or Equipment Description
R008	Coating spray application no. 8 for plastic athletic equipment manufacture with a passive filter to control particulate emissions.
R009	Coating spray application no. 9 for plastic athletic equipment manufacture with a passive filter to control particulate emissions.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

a. d)(3), d)(4), d)(5), d)(6) and e)(4)

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

a. b)(1)c

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.50 ton per month, averaged over a rolling, 12-month period. See b)(2)a.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the OC emissions from this air contaminant source since the potential to emit is less than 10 tons/year taking into account the federally enforceable restrictions in b)(1)c. See b)(2)b.
c.	OAC rule 3745-31-05(D)	See section B.
d.	OAC rule 3745-17-11(B)(1)	See b)(2)c.
e.	OAC rule 3745-17-11(C)	See b)(2)d.

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. This emissions unit is exempt from the emission limitation requirements of OAC rule 3745-17-11(B)(1) pursuant to OAC rule 3745-17-11(A)(1)(k) because hand held cup spray guns are employed.
- d. This emissions unit is exempt from the control, inspection and record keeping requirements of OAC rule 3745-17-11(C) pursuant to OAC rule 3745-17-11(A)(1)(k) because hand held cup spray guns are employed.

c) Operational Restrictions

- (1) The permittee shall operate the respective dry filtration system(s) for the control of particulate emissions whenever any emissions unit is in operation and shall maintain the dry particulate filter(s) associated with each of these emissions units, R008 and R009, in accordance with the manufacturer's recommendations, instructions and/or operating manual(s), with any modifications deemed necessary by the permittee.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records that document any time periods when the dry particulate filter system was not in service when these emissions units, R008 and R009, were 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.
- (2) The permittee shall collect and record the following information for each month for each of these emissions units, R008 and R009:
 - a. the company identification for each coating and cleanup material employed;
 - b. the VOC/OC content of each coating and cleanup material, in pounds per gallon, as applied;
 - c. the total combined VOC/OC emissions for all coatings and cleanup materials employed, in tons per month;
 - d. the total combined VOC/OC emission rate for all coatings and cleanup materials employed, in tons per rolling, 12-month period;
 - e. the total emissions for all coating and all cleanup materials of each individual HAP, in tons/month;
 - f. the total emissions for all coatings and all cleanup materials of total combined HAPs, in tons/month; and
 - g. the total volume of all coating and all cleanup materials employed, in gals/month.
- (3) The federally enforceable permit-to-install and operate (FEPTIO) application for this/these emissions unit(s), R008 and R009, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):



- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: ethyl benzene w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 87 (*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 0.40 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 21.28

MAGLC (ug/m3): 2,068

- e. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: xylene w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 434 (*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 0.89 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 46.81



MAGLC (ug/m3): 10,338

The permittee, has demonstrated that emissions of xylene, from emissions unit(s) R008 and R009, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);



- b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
 - (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operations;



- b. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. The permittee shall operate the respective dry filtration system(s) for the control of particulate emissions whenever any emissions unit is in operation and shall maintain the dry particulate filter(s) associated with each of these emissions units, R008 and R009, in accordance with the manufacturer's recommendations, instructions and/or operating manual(s), with any modifications deemed necessary by the permittee.
- c. the probable cause of each deviation (excursion);
- d. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- e. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Ohio EPA Northeast District Office).

- (4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) **Testing Requirements**

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

- a. Emission Limitation:

OC emissions shall not exceed 0.50 ton per month, averaged over a rolling, 12-month period.

Applicable Compliance Method:

Compliance with the OC emission limitation shall be demonstrated by the record keeping requirements specified in section d) of this permit.



Draft Permit-to-Install and Operate

ALL AMERICAN SPORTS CORP

Permit Number: P0118120

Facility ID: 0247040955

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



3. Emissions Unit Group -Hydrographics Stations: R010, R011

EU ID	Operations, Property and/or Equipment Description
R010	Hydrographics station #1 used for application of a polyvinyl alcohol (PVA) film to helmet shell, equipped with passive filter.
R011	Hydrographics station #2 used for application of a polyvinyl alcohol (PVA) film to helmet shell, equipped with passive filter.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

a. d)(3)

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

a. b)(1)c

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.18 ton per month, averaged over a rolling, 12-month period. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the OC emissions from this air contaminant source since the potential to emit is less than 10 tons/year taking into account the federally enforceable restrictions in b)(1)c.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)b.
c.	OAC rule 3745-31-05(D)	See section B.

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c) Operational Restrictions

- (1) The permittee shall operate the respective dry filtration system(s) for the control of particulate emissions whenever any emissions unit is in operation and shall maintain the dry particulate filter(s) associated with each of these emissions units, R010 and R011, in accordance with the manufacturer’s recommendations, instructions and/or operating manual(s), with any modifications deemed necessary by the permittee.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records that document any time periods when the dry particulate filter system was not in service when these emissions units, R008 and R009, were 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.
- (2) The permittee shall collect and record the following information for each month for each of these emissions units, R010 and R011:
 - a. the company identification for each coating and cleanup material employed;
 - b. the VOC/OC content of each coating and cleanup material, in pounds per gallon, as applied;
 - c. the total combined VOC/OC emissions for all coatings and cleanup materials employed, in tons per month;
 - d. the total combined VOC/OC emission rate for all coatings and cleanup materials employed, in tons per rolling, 12-month period;



- e. the total emissions for all coating and all cleanup materials of each individual HAP, in tons/month;
 - f. the total emissions for all coatings and all cleanup materials of total combined HAPs, in tons/month; and
 - g. the total volume of all coating and all cleanup materials employed, in gals/month.
- (3) 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 FEPTIO 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 FEPTIO.
- e) Reporting Requirements
- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
 - (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operations;
 - b. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the



potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. The permittee shall operate the respective dry filtration system(s) for the control of particulate emissions whenever any emissions unit is in operation and shall maintain the dry particulate filter(s) associated with each of these emissions units, R010 and R011, in accordance with the manufacturer's recommendations, instructions and/or operating manual(s), with any modifications deemed necessary by the permittee.
- c. the probable cause of each deviation (excursion);
- d. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- e. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Ohio EPA Northeast District Office).

f) Testing Requirements

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

- a. Emission Limitation:

OC emissions shall not exceed 0.18 ton per month, averaged over a rolling, 12-month period.

- Applicable Compliance Method:

Compliance with the OC emission limitation shall be demonstrated by the record keeping requirements specified in section d) of this permit.

g) Miscellaneous Requirements

- (1) None.