John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

1/12/2015

Certified Mail

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

Mr. Serge Labbe
HDI Landing Gear Division
15900 Foltz Industrial Parkway
Strongsville, OH 44136

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

Facility ID: 1318558719
Permit Number: P0117844
Permit Type: Initial Installation
County: Cuyahoga

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 Plain Dealer. 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

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114

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 Cleveland Division of Air Quality at (216)664-2297.

Sincerely,

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

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

Permit Strategy Write-Up

1. Check all that apply:

   Synthetic Minor Determination ***(not applicable)***

   Netting Determination***(not applicable***)

2. Source Description:

   Initial PTIO for equipment required to manufacture landing gears for the aviation industry, including hard chrome plating lines P001 - P004 controlled with packed bed scrubber and composite mesh pad, miscellaneous metal painting lines K001 - K002 vented to a dry filter, and an open top trichloroethylene vapor degreaser L001 equipped with a refrigerated condenser coil.

3. Facility Emissions and Attainment Status:

   The facility has the potential to emit of approximately 33 tons/year of VOC emissions, 8.5 tons/year of a single HAP, and 14 tons/year of combined HAPs. Cuyahoga County is currently designated as nonattainment for ozone, $PM_{2.5}$, and partial nonattainment for lead.

4. Source Emissions:

   Each emissions unit has emission limitations that have been established at the maximum potential to emit. Emissions unit L001 is limited to 8.44 tons VOC (trichloroethylene) per rolling, 12-month period, emissions units P001 – P001 are each limited to the MACT Subpart N limitation of 0.006 mg/dscm of total chromium emissions, and emissions units K001 and K002 are restricted to a total combined limit of 12.96 tons/year VOC from coatings and 12 tons/year of VOC from cleanup material.

5. Conclusion:

   The maximum potential to emit for all of the emissions units combined at this facility limits emissions of VOC and HAPs below the Title V major source threshold. Consequently, this facility is not subject to Title V and it is not necessary to process a FEPTIO permit to further restrict emissions.

6. Please provide additional notes or comments as necessary:

   This permit is being issued Draft in order to ensure that the emission limits in this permit that have been established at maximum potential to emit will be established as federally enforceable.

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

Pollutant	Tons Per Year
VOC	33
Single HAP	8.5
Combined HAP	14

PUBLIC NOTICE
1/12/2015 Issuance of Draft Air Pollution Permit-To-Install and Operate

HDI Landing Gear Division
15900 Foltz Industrial Pkwy,
Strongsville, OH 44136
Cuyahoga County
FACILITY DESC.: Other Aircraft Parts and Auxiliary Equipment Manufacturing
PERMIT #: P0117844
PERMIT TYPE: Initial Installation
PERMIT DESC: Initial PTIO for equipment required to manufacture landing gears for the aviation industry, including hard chrome plating lines P001 - P004 controlled with packed bed scrubber and composite mesh pad, miscellaneous metal painting lines K001 - K002 vented to a dry filter, and an open top trichloroethylene vapor degreaser L001 equipped with a refrigerated condenser coil.

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: David Hearne, Cleveland Division of Air Quality, 2nd Floor 75 Erieview Plaza, Cleveland, OH 44114. Ph: (216)664-2297

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
HDI Landing Gear Division

Facility ID:	1318558719
Permit Number:	P0117844
Permit Type:	Initial Installation
Issued:	1/12/2015
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
HDI Landing Gear Division

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Authorization

Facility ID:	1318558719
Application Number(s):	A0051978, A0052020, A0052090
Permit Number:	P0117844
Permit Description:	Initial PTIO for equipment required to manufacture landing gears for the aviation industry, including hard chrome plating lines P001 - P004 controlled with packed bed scrubber and composite mesh pad, miscellaneous metal painting lines K001 - K002 vented to a dry filter, and an open top trichloroethylene vapor degreaser L001 equipped with a refrigerated condenser coil.
Permit Type:	Initial Installation
Permit Fee:	$1,400.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	1/12/2015
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:

HDI Landing Gear Division
15900 Foltz Industrial Pkwy
Strongsville, OH 44136

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:

Cleveland Division of Air Quality
2nd Floor
75 ErieviewPlaza
Cleveland, OH 44114
(216)664-2297

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: P0117844
Permit Description: Initial PTIO for equipment required to manufacture landing gears for the aviation industry, including hard chrome plating lines P001 - P004 controlled with packed bed scrubber and composite mesh pad, miscellaneous metal painting lines K001 - K002 vented to a dry filter, and an open top trichloroethylene vapor degreaser L001 equipped with a refrigerated condenser coil.

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

Emissions Unit ID:	**L001**
Company Equipment ID:	Vapor Degreaser
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: HardChromePlating

Emissions Unit ID:	**P001**
Company Equipment ID:	CHR01
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	CHR03
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P003**
Company Equipment ID:	CHR04
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P004**
Company Equipment ID:	CHR01
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

Group Name: Paint Booths

Emissions Unit ID:	**K001**
Company Equipment ID:	Painting Dept.
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Paint Booth 2
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

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 Cleveland Division of Air Quality 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 beingpermanently shut down without first applying for and obtaining a permit pursuantto 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.

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) B2., B.3., B.4..

2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart N, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website http://www.ecfr.gov/ or by contacting the appropriate Ohio EPA District Office or Local Air Agency.

3. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart T, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website http://www.ecfr.gov/ or by contacting the appropriate Ohio EPA District Office or Local Air Agency.

4. The permittee is advised that this facility may be subject to the "Generally Available Control Technology" (GACT) requirements under Title 40 of the Code of Regulations, Part 63, Subpart WWWWWW, the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Plating and Polishing Operations. At this time the Ohio EPA is not accepting the delegating authority to enforce the standards promulgated under the Urban Air Toxics Strategy. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of this Subpart (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website http://www.ecfr.gov/ or by contacting the appropriate Ohio EPA District Office or Local Air Agency.

C. Emissions Unit Terms and Conditions

1. L001, Vapor Degreaser

Operations, Property and/or Equipment Description:

Gemcraft Chemical Open Top Trichloroethylene Batch Vapor Degreaser equipped with a refrigerated condenser coil

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. b)(1)b., and b)(2)b.

(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.	ORC 3704.03(T) OAC rule 3745-31-05(A)(3) June 30, 2008	The BAT requirements of this rule are equivalent to the requirements of 40 CFR Part 63, Subpart T, MACT rule. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 tons/year. See b)(2)b. below.

c.	OAC Rule 3745-31-05(F)	VOC emissions from this emissions unit shall not exceed 8.44 tons per rolling 12-month period
d.	40 CFR 63 Subpart T 40 CFR 63.460 – 63.471	This emissions unit shall comply with all the applicable sections of 40 CFR Part 63, Subpart T. See b)(2)c. below.
e.	40 CFR Part 63, Subpart A 40 CFR 63.1 – 63.15	Appendix B to Subpart T of 40 CFR Part 63 – Applicability of General Provisions to Subpart T shows which parts of the General Provisions in 40 CFR 63.1 – 63.15 apply.

(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)(ii) (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. The permittee shall follow the additional terms and conditions requirements for this emission unit specified in the requirements of 40 CFR 63, Subpart T, including the following sections:

	Applicable Rule	Requirement
a.	63.464(a)(1)(ii)	ensure that the emissions from each solvent cleaning machine are equal to or less than the applicable emission limit presented in table 5 of this subpart as determined using the procedures in §63.465(b) and (c)
b.	63.464(a)(1)(ii) Table 5	emission limit of 150 kilograms/square meters/month based on 3-month rolling average monthly emission limit
c.	40 CFR 63.471	facility-wide standards

c) Operational Restrictions

(1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart T, including the following sections:

	Applicable Rule	Requirement
a.	40 CFR 63.465 (b)	on the first operating day of every month ensure that the solvent cleaning machine system contains only clean liquid solvent

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart T, including the following sections:

	Applicable Rule	Requirement
a.	40 CFR 63.464(a)(1)(i)	maintain a log of solvent additions and deletions
b.	40 CFR 63.467(c)(1) through (3)	maintain records of dates and amounts of solvent added; solvent composition of wastes removed from cleaning machines; calculation sheets showing how monthly emissions and the rolling 3-month average emissions from the solvent cleaning machine were determined, and the results of all calculations

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland division of Air Quality (Cleveland DAQ) by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall submit reports and such other notifications to the Cleveland DAQ as are required pursuant to 40 CFR Part 63, Subpart T, per the following sections:

	Applicable Rule	Requirement
a.	40 CFR 63.468(b)	a brief description of each solvent cleaning machine, machine type, solvent/air interface area, and controls; anticipated compliance approach; General Provisions

b.	40 CFR 63.468(e)(1) through (4)	initial statement of compliance, including name and address of the solvent cleaning machine owner or operator; address of the solvent cleaning machine; solvent/air interface area; results of the first 3-month average emissions calculation
c.	40 CFR 63.468(g)(1) through (3)	annual solvent emission report that contains size and type of each unit subject to this subpart (solvent/air interface area or cleaning capacity); average monthly solvent consumption in kilograms per month; 3-month monthly rolling average solvent emission
d.	40 CFR 63.468(h)	exceedance report semiannually or quarterly if an exceedance occurs
e.	40 CFR 63.468(i)	reduce the frequency of reporting

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. <u>Emission limitation:</u>

8.44 tons per rolling 12-month period

<u>Applicable Compliance Method</u>

Compliance shall be demonstrated from the record keeping in d)(1) by summing the monthly emissions (in pounds) for each rolling, 12-month period and divide the pounds of emissions by 2000 lbs/ton.

(2) The testing requirements for this emission unit are specified in the requirements of 40 CFR 63, Subpart T, including the following sections:

	Applicable Rule	Requirement
a.	40 CFR 63.465(c)(1)	determine solvent emissions (Ei) using equation (2), ($E_i = \frac{SA_i - LSR_i - SSR_i}{AREA_i}$), from the records of all solvent additions and deletions for the previous monthly reporting period where: *E_i = the total halogenated HAP solvent emissions* *SA_i = the total amount of halogenated HAP liquid solvent added* *LSR_i = the total amount of halogenated HAP liquid solvent removed* SSR_i = the total amount of halogenated HAP solvent removed in solid waste *$AREA_i$ = the solvent/air interface area*
b.	40 CFR 63.465(c)(2)	termine total amount of halogenated HAP solvent removed from the solvent cleaning machine in solid waste using: from tests conducted using EPA reference method 25d; or by engineering calculations
c.	40 CFR 63.465(c)(3)	determine monthly rolling average, for the 3-month period using equation (4) $$EA_i = \frac{\sum_{j=1}^{3} E_i}{3}$$ *Where* EA_i = the average halogenated HAP solvent emissions over the preceding 3 monthly reporting periods E_i = halogenated HAP solvent emissions for each month (j) for the most recent 3 monthly reporting periods j= the most recent monthly reporting period (j=1))

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group –Hard Chrome Plating: P001,P002,P003,P004,

EU ID	Operations, Property and/or Equipment Description
P001	Open Surface Hard Chrome Plating Tank 6124, 306.19 amperes, controlled with packed bed scrubber and composite mesh pad system
P002	Open Surface Hard Chrome Plating Tank 6125, 306.19 amperes, controlled with packed bed scrubber and composite mesh pad system
P003	Open Surface Hard Chrome Plating Tank 6126, 424.4 amperes, controlled with packed bed scrubber and composite mesh pad system
P004	Off-Line Trivalent Chrome Tank 6123, 63.34 amperes, controlled with packed bed scrubber and composite mesh pad system

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. b)(1)b., and b)(2)b.

(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.	ORC 3704.03(T) OAC rule 3745-31-05(A)(3) June 30, 2008	The BAT requirements of this rule are equivalent to the requirements of 40 CFR Part 63, Subpart N, MACT rule. See b)(2)a. below

b.	AC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the potential to emit is less than 10 tons/year. See b)(2)b. below
c.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)	The particulate emission limitation specified by this rule is less stringent than the emission limitation established under 40 CFR Part 63, Subpart N.
e.	40 CFR 63 Subpart N 40 CFR 63.340 – 63.348	These emissions units shall comply with all the applicable sections of 40 CFR Part 63, Subpart N. See b)(2)c. below.
f.	40 CFR Part 63, Subpart A 40 CFR 63.1 – 63.16	Appendix containing Table 1 to Subpart N of 40 CFR Part 63 – Applicability of General Provisions to Subpart N shows which parts of the General Provisions in 40 CFR 63.1 – 63.16 apply.

(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)(ii) (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. The permittee shall not allow the concentration of total chromium emissions in the exhaust gas stream discharged from the enclosed, hard chromium electroplating tank(s) to exceed 0.006 mg/dscm(2.6×10^{-6} gr/dscf). This limitation also applies during startup and shutdown operations.

d. After September 21, 2015, the owner or operator of an affected open surface hard chromium electroplating tank shall not add PFOS-based fume suppressants to any affected open surface hard chromium electroplating tanks.

c) Operational Restrictions

(1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart N, including the following sections:

	Applicable Rule	Requirement
a.	40 CFR 63.342(f)(1) and (2)	operation and maintenance practices
b.	CFR 63.342(f)(3)	prepare an operation and maintenance plan to be implemented no later than the startup of the unit or the compliance date
c.	40 CFR 63.342(g)	the standards in this section that apply to chromic acid baths shall not be met by using a reducing agent to change the form of chromium from hexavalent to trivalent
d.	40 CFR 63.342 Table 1	work practice standards for the packed-bed scrubber and composite mesh-pad control system work practice standards to ensure the accuracy of the monitoring instrument, if a pitot tube or stalagmometer is used for monitoring the plating tank
e.	40 CFR 63.342 Table 2	housekeeping practices

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart N, including the following sections:

	Applicable Rule	Requirement
a.	40 CFR 63.343(c)(3)	monitoring and record keeping requirements to demonstrate compliance using a packed bed scrubber in conjunction with a composite mesh-pad system
b.	40 CFR 63.344(d)(2)	monitoring equipment purchased from a vendor, verification of the operational status of the monitoring equipment including execution of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system
c.	40 CFR 63.346(a)	recordkeeping according to the applicability of subpart A of this part as identified in Table 1 of this subpart
d.	40 CFR 63.346(b)(1)	inspection records for the add-on air pollution control device and monitoring equipment

e.	40 CFR 63.346(b)(2)	records of all maintenance performed on the tank(s), add-on air pollution control device, and monitoring equipment
f.	40 CFR 63.346(b)(3)	records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control device, and monitoring equipment
g.	40 CFR 63.346(b)(4)	Records of actions taken during periods of malfunction to minimize emissions
h.	40 CFR 63.346(b)(5)	other records
i.	40 CFR 63.346(b)(6)	documenting results of all performance tests
j.	40 CFR 63.346(b)(7)	all measurements as may be necessary to determine the conditions of performance tests
k.	40 CFR 63.346(b)(8)	records of monitoring data
l.	40 CFR 63.346(b)(9)	specific identification of each period of excess emissions that occurs during malfunction of the process, add-on air pollution control, or monitoring equipment
m.	40 CFR 63.346(b)(10)	specific identification of each period of excess emissions that occurs during periods other than malfunction of the process, add-on air pollution control, or monitoring equipment
n.	40 CFR 63.346(b)(11)	total process operating time during the reporting period
o.	40 CFR 63.346(b)(15)	any information demonstrating whether a source is meeting the requirements for a waiver of recordkeeping or reporting requirements
p.	40 CFR 63.346(b)(16)	all documentation supporting the notifications and reports
q.	40 CFR 63.346(c)	all records shall be maintained for a period of 5 years

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality (Cleveland DAQ) by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall submit reports and such other notifications to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart N, per the following sections:

	Applicable Rule	Requirement
a.	40 CFR 63.347(a)	fulfill all reporting requirements
b.	CFR 63.347(c)(2)	additional reporting requirements of notification of construction or reconstruction was commenced and actual date of startup of the source
c.	40 CFR 63.347(d)	notification of performance test
d.	40 CFR 63.347(e)	notification of compliance status
e.	40 CFR 63.347(f)	reports of performance test results
f.	40 CFR 63.347(h)	ongoing compliance status reports for area sources
g.	40 CFR 63.347(h)(2)(i)-(iii)	submittal of semiannual reports
h.	40 CFR 63.347(h)(3)	request to reduce frequency of ongoing compliance status reports

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. <u>Emission Limitation:</u>

0.006 mg/dscm (2.6×10^{-6} gr/dscf)

<u>Applicable Compliance Method:</u>

The permittee shall conduct, emission testing for these emissions units in accordance with the following requirements, in order to demonstrate compliance with the chromium emission limitation contained in this permit:

One of the following test methods shall be employed to demonstrate compliance:

i. Method 306 or Method 306A, "Determination of Chromium Emissions From Decorative and Hard Chromium Electroplating and Anodizing Operations", from Appendix A of Part 63, shall be used to determine the chromium concentration from the chromium electroplating tank(s), and testing must meet the following requirements:

(a) the sampling time and sample volume for each run of Methods 306 and 306A shall be at least 120 minutes and 1.70 dscm (60 dscf), respectively;

(b) Methods 306 and 306A allow the measurement of either total chromium or hexavalent chromium emissions;

(c) for chromic acid baths compliance must be demonstrated by measuring total chromium; and

(d) A minimum of three separate runs of the test method must be conducted in order to demonstrate compliance. All the applicable performance testing requirements of 40 CFR 63.7 must also be met.

ii. The California Air Resources Board (CARB) Method 425 shall be used to determine the chromium concentration from the electroplating tank(s) if the following conditions are met:

(a) if a colorimetric analysis method is used, the sampling time and volume shall be sufficient to result in 33-66 micrograms of catch in the sampling train;

(b) if an Atomic Absorption Graphite Furnace (AAGF) or Ion Chromatography with a Post-column Reactor (ICPCR) analyses is used, the sampling time and volume should be sufficient to result in a sample catch that is 5 to 10 times the minimum detection limit of the analytical method (i.e., 1.0 microgram per liter of sample for AAGF and 0.5 microgram per liter of sample for ICPCR); and

(c) a minimum of three separate runs of the test method must be conducted in order to demonstrate compliance. All the applicable performance testing requirements of 40 CFR 63.7 must also be met.

(2) The permittee shall conduct, emission testing for this emissions unit in accordance with the following requirements, in order to demonstrate compliance with the emission limitation contained in this permit:

a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 1.5 years after initial startup of the emissions unit (this allows for the initial 180 days after startup plus a one year extension in accordance with 40 CFR Part 63.343).

b. The test methods identified in f)(1)a. and f)(3)c. shall be employed to demonstrate compliance.

c. The tests shall be performed while the emissions unit is operating at or near its maximum operating capacity, unless otherwise specified or approved by the Cleveland Division of Air Quality.

d. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such

notification for review and approval prior to the test(s) may result in the Ohio EPA's refusal to accept the results of the emission test(s).

e. Personnel from the Cleveland DAQ shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

f. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ within 60 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ

(3) The permittee shall conduct performance testing requirements required under 40 CFR Part 63, Subpart N, including the following sections:

	Applicable Rule	Requirement
a.	40 CFR 63.344(a)	performance test requirements
b.	40 CFR 63.344(b)	performance testing at startup to obtain an operating permit to be used to demonstrate compliance with this subpart
c.	40 CFR 63.344(c)	test methods to use
d.	40 CFR 63.344(d)	establishing site-specific operating parameter values
e.	40 CFR 63.344(e)	special compliance provisions for multiple sources controlled by a common add-on air pollution control device

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -Paint Booths: K001,K002,

EU ID	Operations, Property and/or Equipment Description
K001	Miscellaneous Metal Parts Coating Line using HVLP spray guns vented to dry filter: OTP Industrial Solutions, model I-141016 paint booth
K002	Miscellaneous Metal Parts Coating Line using HVLP spray guns vented to dry filter: OTP Industrial Solutions, model I-141016 paint booth

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)(10)-d)(13), and e)(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. 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.	ORC 3704.03(T) OAC rule 3745-31-05(A)(3) June 30, 2008	VOC emissions from K001 and K002 combined shall not exceed 1.08 ton per month as a rolling 12-month average from coatings and 1.0 ton per month as a rolling 12-month average from cleanup material.
b.	OAC rule 3745-17-11(C)	See c)(1) and d)(1) – d)(5) below.
c.	OAC rule 3745-21-19	See b)(2)a. below.
d.	OAC rule 3745-114-01	See d)(10) – d)(13) and e)(5) below.

(2) Additional Terms and Conditions

a. The VOC content of the Primer and Topcoat coatings employed shall not exceed 2.9 and 3.5 pounds of VOC per gallon, as applied, excluding water and exempt solvents respectively. If needed, compliance may be determined based on a daily volume-weighted average VOC content.

c) Operational Restrictions

(1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

(3) The permittee shall comply with the requirements of:

a. hand wipe cleaning operations as identified in OAC rule 3745-21-19(E)(1);

b. spray gun cleaning operations as specified in OAC rule 3745-21-19(E)(2);

c. flush cleaning operations as specified in OAC rule 3745-21-19(E)(3); and

d. housekeeping measures for cleaning solvents and solvent-laden cleaning materials used in cleaning operations as specified in OAC rule 3745-21-19(E)(4).

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Cleveland Division of Air Quality (Cleveland DAQ) upon request.

(2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Cleveland DAQ upon request.

(3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Cleveland DAQ upon request.

(5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/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. These records shall be maintained for a period of not less than five years and shall be made available to the Cleveland DAQ upon request.

(6) The permittee shall collect and record the following information each month for the coating line:

a. the name and identification number of each coating employed;

b. the VOC content of each coating, as applied, in lbs/gal;

c. the amount, in gallons, of each coating, as applied;

d. the monthly VOC emissions from all the coatings employed, in pounds, [i.e., the sum of d)(6)b. times d)(6)c. for each coating employed]; and

e. the VOC content of each coating, as received and as applied, in lbs/gal less water and exempt solvents.

If the permittee mixes complying coatings, it is not necessary to record the VOC content of the resulting mixture.

(7) If needed, the permittee shall maintain daily records of the daily volume-weighted average VOC content, as applied, in lbs VOC/gallon excluding water and exempt solvents in accordance with f)(1)c. below.

(8) The permittee shall collect and record the following information for each month for this emissions unit:

a. the company identification of each cleanup material employed;

b. the amount, in gallons, of each cleanup material employed;

c. the amount of cleanup material recovered, in gallons;

d. the VOC content of each cleanup material employed, in pounds per gallon; and

e. the total VOC emissions from all the cleanup materials employed, in pounds [i.e., the sum of [d)(7)b. - d)(7)c.] multiplied by d)(7)d. for each cleanup material employed];

f. the VOC composite vapor pressure of each cleanup material and documentation showing the composition of each cleaning solvent;

g. hand wipe cleaning record per OAC rule 3745-21-19(J)(3)(c) and (d);

h. flush cleaning record per OAC rule 3745-21-19(J)(3)(e); and

i. spray gun cleaning record per OAC rule 3745-21-19(J)(3)(f).

(9) The permittee shall calculate and record the annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the monthly VOC emission rates from the coating materials in d)(6) and the sum of the monthly emissions from cleanup materials in d)(7)].

(10) The PTIO application for these emissions unit, K001 and K002, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this emissions unit 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 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, (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 was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" 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):

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = TLV/42 = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants or "worst case" toxic contaminant(s):

Toxic Contaminant: Toluene, covered under the worst-case toxic modeled.

TLV: 20 ppm (Toluene)

Maximum Hourly Emission Rate (lbs/hr): 2.1 (Toluene)

Predicted 1-Hour Maximum Ground Level Concentration ($\mu g/m^3$): 158.2

MAGLC ($\mu g/m^3$): 1794.34

The permittee, having demonstrated that emissions of Toluene, from emissions unit K001 and K002, is estimated 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).

(11) 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 PTIO 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.

(12) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":

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.

(13) 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) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland division of Air Quality (Cleveland DAQ) by the due date identified in the Authorization

section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall submit an initial compliance status report within sixty calendar days after the compliance date per OAC rule 3745-21-19(K)(2)(a) and (K)(2)(d).

(4) The permittee shall submit semiannual compliance status reports no later than thirty calendar days after the end of each six-month period to the Cleveland DAQ per OAC rule 3745-21-19(K)(3)(a) and (K)(3)(e). The semiannual compliance status reports shall include compliance certification per 745-21-19(K)(3)(f)(i) and (f)(v).

(5) The permittee shall include in the annual Permit Evaluation Report (PER) any changes made to a parameter or value used in the dispersion model, that was used to maintain compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground−level concentration. 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. <u>Emissions Limitation:</u>

VOC emissions from coatings, from K001 and K002 combined, shall not exceed 1.08 ton/month as a rolling 12-month average.

<u>Applicable Compliance Method</u>:

Compliance shall be based upon the record keeping specified in d)(6) and d)(9) and divide the rolling 12-month emissions by 12 to determine the monthly average.

b. <u>Emissions Limitation:</u>

VOC emissions due to cleanup, from K001 and K002 combined, shall not exceed 1.0 ton/month as a rolling 12-month average.

<u>Applicable Compliance Method</u>:

Compliance shall be based upon the record keeping specified in d)(8) and d)(9) and divide the rolling 12-month emissions by 12 to determine the monthly average

c. <u>Emissions Limitation</u>:

The VOC content of the Primer and Topcoat coatings employed shall not exceed 2.9 and 3.5 pounds of VOC per gallon, as applied, excluding water and exempt solvents respectively.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(6). The mass of VOC per volume of each coating, excluding water and exempt solvents, as applied, shall be calculated as follows:

$C_{VOC,2} = (D_C)(W_{VOC})/(V_S + V_{VOC})$

Where:

$C_{VOC,2}$= VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents

D_C = density of coating, in pounds of coating per gallon of coating.

V_S = volume fraction of solids (nonvolatile matter) in coating, in gallon of solids per gallon of coating.

$V_{VOC} = V_{VM} – V_W – V_{ES}$

$W_{VOC} = W_{VM} – W_W – W_{ES}$

V_{VOC} = volume fraction of VOC in a coating.

W_{VOC} = weight fraction of VOC in a coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

If needed, the daily volume-weighted average VOC content (excluding water and exempt solvents) shall be determined using the following equation from OAC rule 3745-21-10(B)(9):

$$(C_{VOC,2})_A = \frac{\sum_{i=1}^{n} C_{VOC,2i} L_{Ci}(V_{Si} + V_{VOCi})}{\sum_{i=1}^{n} L_{Ci}(V_{Si} + V_{VOCi})}$$

Where,

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period t.

L_C = liquid volume of coating employed during time period t, in gallons of coating.

i = subscript denoting a specific coating employed during time period t.

n = total number of coatings employed during time period t.

t = time period specified for the weighted average VOC content.

Note: If all coatings, as applied, are compliant coatings, then it is not necessary to determine the daily volume-weighted average VOC content.

(2) In accordance with OAC rule 3745-21-04(B)(5), use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

(3) US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

g) Miscellaneous Requirements

(1) None.