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

3/6/2015

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
No	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Craig Hanna
Worthington Cylinder Corporation
1085 DEARBORN RD
Columbus, OH 43085

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0125041404
Permit Number: P0104625
Permit Type: Renewal
County: Franklin

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

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

If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

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

Cc: Ohio EPA-CDO

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Worthington Cylinder Corporation

Facility ID:	0125041404
Permit Number:	P0104625
Permit Type:	Renewal
Issued:	3/6/2015
Effective:	3/6/2015
Expiration:	3/6/2020

Division of Air Pollution Control
Permit-to-Install and Operate
for
Worthington Cylinder Corporation

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Authorization

Facility ID:	0125041404
Application Number(s):	A0013258, A0037175, M0002783
Permit Number:	P0104625
Permit Description:	Renewal PTIO for pressure cylinder paint lines K001 and K002 and three-station silk screening operation K003.
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	3/6/2015
Effective Date:	3/6/2015
Expiration Date:	3/6/2020

Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

Worthington Cylinder Corporation
1085 DEARBORN RD
COLUMBUS, OH 43085

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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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: P0104625
Permit Description: Renewal PTIO for pressure cylinder paint lines K001 and K002 and three-station silk screening operation K003.

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

Emissions Unit ID:	**K001**
Company Equipment ID:	REFRIGERANT PAIN
Superseded Permit Number:	01-08927
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	REFILLABLE PAIN
Superseded Permit Number:	01-08927
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K003**
Company Equipment ID:	SILK SCREENING
Superseded Permit Number:	01-08927
General Permit Category and Type:	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 [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as 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) None.

C. Emissions Unit Terms and Conditions

1. K001, West Paint Booth

Operations, Property and/or Equipment Description:

Pressure cylinder paint line (Dot 39) with infra-red oven (West 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. 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) [Established by PTI 01-08579, issued final 08/13/02]	Volatile organic compound (VOC) emissions shall not exceed 32.9 pounds per hour (lbs/hr) from coating material(s). Organic compound (OC) emissions shall not exceed 6.59 lbs/hr and 8.24 tons per year (tpy) from cleanup material(s). The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U) and OAC rule 3745-31-05(D). See b)(2)a.
b.	OAC rule 3745-21-09(U)(1)(c)	See c)(1) below.
	OAC rule 3745-31-05(D) [Established by PTI 01-08579, issued final 08/13/02]	VOC emissions shall not exceed 45 tons per year based on a rolling, 12-month summation of monthly emissions.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)b. – c.

(2) Additional Terms and Conditions

a. The hourly VOC emissions limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

b. Individual hazardous air pollutant (HAP) emissions from all coating materials employed in emissions units K001, K002, K003, and P005 combined, shall not exceed 9.9 tons per rolling, 12-month period.

c. Combined HAP emissions from all coating materials employed in emissions units K001, K002, K003, and P005 combined, shall not exceed 24.9 tons per rolling, 12-month period.

c) Operational Restrictions

(1) The VOC content of any coating used in this emissions unit shall not exceed 3.29 pounds of VOC per gallon, excluding water and exempt solvents, as applied.

(2) The OC content of any cleanup material used in this emissions unit shall not exceed 6.69 pounds of OC per gallon, as applied.

(3) Any cleanup material used in this emissions unit shall not contain any VOCs, as defined by OAC rule 3745-21-01(B)(16).

(4) The total maximum annual coating usage shall not exceed 27,337 gallons per rolling, 12-month summation of the coating usage figures.

(5) The total maximum annual cleanup material usage shall not exceed 2500 gallons per year.

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

(7) This emissions unit shall be operated and maintained in accordance with the manufacterer's recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per the manufacturer's recommendations in order to maintain the highest effective level of particulate emission control.

(8) The permittee shall maintain a minimum stack height of 33 feet above the ground for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification number of each coating and cleanup material, as applied;

b. he VOC content of each coating, excluding water and exempt solvents, in pounds VOC per gallon, as applied;

c. the OC content of each cleanup material in pounds OC per gallon cleanup material, as applied;

d. the individual HAP content for each HAP of each coating in pounds of HAP per gallon of coating, as applied;

e. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;

f. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from d.);

g. the total combined HAP content of each cleanup material in pound of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from e.);

h. the total coating usage for the emissions unit, in gallons;

i. the total cleanup usage for the emissions unit, in gallons;

j. the VOC emissions from all coating used in this emissions unit, in pound or tons of VOC;

k. the OC emissions from all cleanup material used in this emissions unit, in pounds or tons of OC;

l. the individual HAP emissions for each HAP from all coating and cleanup material, in pounds or tons of individual HAP;

m. the total combined HAP emissions from all coating and cleanup material, in pound or tons of total combined HAPs;

n. the rolling, 12-month summation of monthly coating usage, in gallons per rolling, 12-month period;

o. the rolling, 12-month summation of the monthly VOC emissions from all coatings, in pounds or tons per rolling, 12-month period;

p. the rolling, 12-month summation of the monthly individual HAP emissions for each HAP from all coating and cleanup material from emissions units K001, K002, K003, and P005 combined, in pounds or tons per rolling, 12-month period (for each HAP the sum of d. times h. for each coating and the sum of e. times i. for each cleanup material); and

q. the rolling, 12-month summation of the monthly total combined HAP emissions from all coating and cleanup material from emissions units K001, K002, K003, and P005 combined in pounds or tons per rolling, 12-month period (the sum of f. times h. for each coating plus the sum of g. times i. for each cleanup material).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials.

(2) The permittee shall collect and record the following information each year for this emission unit:

a. the OC containing cleanup material usage for the emissions unit, in gallons; and

b. the OC emissions from all OC containing cleanup material in this emissions unit, in pounds or tons of OC.

(3) The permittee shall maintain daily records that document the date any cleanup material containing VOCs was used and the quantity used.

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

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing that the VOC content of any coating exceeded the applicable limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days after the exceedance.

(3) 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 twelve months for each air contaminant source identified in this permit.

(4) The permittee shall submit quarterly deviation reports which identify all exceedances of the following:

a. the VOC content for coating material;

b. the rolling, 12-month coating usage limitation;

c. the rolling, 12-month VOC emission limitation;

d. the rolling, 12-month total individual HAP emission limitation from emissions units K001, K002, K003, and P005;

e. the rolling, 12-month combined HAP emissions limitation from emissions units K001, K002, K003, and P005;

f. any time periods when the dry filtration system was not in service when this emissions unit was in operation; and

g. the date any cleanup material containing VOCs was used and the quantity used.

These quarterly deviation reports shall be submitted to the Ohio EPA Central District Office by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during a calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.

(5) The permittee shall also submit annual reports that specify the total VOC, OC, and HAP(s) emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

f) Testing Requirements

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

a. <u>Emission Limitation</u>

VOC emissions shall not exceed 32.9 lbs/hr from coating materials

<u>Applicable Compliance Method</u>

Compliance with the short-term emission limitation shall be demonstrated by multiplying the maximum amount of coating used per hour (10 gal/hr, PTI application submitted 01/14/05) by the maximum VOC content of the coating (3.29 lbs/gal, PT application submitted 01/14/05).

b. <u>Emission Limitation</u>

OC emissions shall not exceed 6.59 lbs/hr and 8.24 tpy from cleanup materials

Applicable Compliance Method

Compliance with the short-term limitation shall be demonstrated by multiplying the maximum amount of cleanup material used per hour (1 gal/hr, PTI application submitted 01/14/05) by the maximum amount OC content of the cleanup material (6.59 lbs/gal, PTI application submitted 01/14/05).

c. Emission Limitation

VOC emissions shall not exceed 45 tons per rolling, 12-month summation

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and recordkeeping required in Section d)(1)o.

d. Emission Limitation

Single HAP emissions from K001, K002, K003, and P005 shall not exceed 9.9 tons per rolling, 12-month summation

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and recordkeeping required in Section d)(1)p.

e. Emission Limitation

Total combined HAP emissions from K001, K002, K003, and P005 shall not exceed 24.9 tons per rolling, 12-month summation

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and recordkeeping in Section d)(1)q.

g) Miscellaneous Requirements

(1) None.

2. K002, East Booth

Operations, Property and/or Equipment Description:

Pressure cylinder paint line (4BA) with infra-red oven (East 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. 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. 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) [Established by PTI 01-08579, issued final 08/13/02]	Volatile organic compound (VOC) emissions shall not exceed 32.9 pounds per hour (lbs/hr) from coating material(s). Organic compound (OC) emissions shall not exceed 6.59 lbs/hr and 8.24 tons per year (tpy) from cleanup material(s). The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U) and OAC rule 3745-31-05(D). See b)(2)a.
b.	OAC rule 3745-21-09(U)(1)(c)	See c)(1) below.
	OAC rule 3745-31-05(D)	VOC emissions shall not exceed 45 tons per year based on a rolling, 12-month

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[Established by PTI 01-08579, issued final 08/13/02]	summation of monthly emissions. See b)(2)b. – c.

(2) Additional Terms and Conditions

a. The hourly VOC emissions limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

b. Individual hazardous air pollutant (HAP) emissions from all coating materials employed in emissions units K001, K002, K003, and P005 combined, shall not exceed 9.9 tons per rolling, 12-month period.

c. Combined HAP emissions from all coating materials employed in emissions units K001, K002, K003, and P005 combined, shall not exceed 24.9 tons per rolling, 12-month period.

c) Operational Restrictions

(1) The VOC content of any coating used in this emissions unit shall not exceed 3.29 pounds of VOC per gallon, excluding water and exempt solvents, as applied.

(2) The OC content of any cleanup material used in this emissions unit shall not exceed 6.69 pounds of OC per gallon, as applied.

(3) Any cleanup material used in this emissions unit shall not contain any VOCs, as defined by OAC rule 3745-21-01(B)(16).

(4) The total maximum annual coating usage shall not exceed 27,337 gallons per rolling, 12-month summation of the coating usage figures.

(5) The total maximum annual cleanup material usage shall not exceed 2500 gallons per year.

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

(7) This emissions unit shall be operated and maintained in accordance with the manufacterer's recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per the manufacturer's recommendations in order to maintain the highest effective level of particulate emission control.

(8) The permittee shall maintain a minimum stack height of 33 feet above the ground for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification number of each coating and cleanup material, as applied;

b. he VOC content of each coating, excluding water and exempt solvents, in pounds VOC per gallon, as applied;

c. the OC content of each cleanup material in pounds OC per gallon cleanup material, as applied;

d. the individual HAP content for each HAP of each coating in pounds of HAP per gallon of coating, as applied;

e. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;

f. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from d.);

g. the total combined HAP content of each cleanup material in pound of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from e.);

h. the total coating usage for the emissions unit, in gallons;

i. the total cleanup usage for the emissions unit, in gallons;

j. the VOC emissions from all coating used in this emissions unit, in pound or tons of VOC;

k. the OC emissions from all cleanup material used in this emissions unit, in pounds or tons of OC;

l. the individual HAP emissions for each HAP from all coating and cleanup material, in pounds or tons of individual HAP;

m. the total combined HAP emissions from all coating and cleanup material, in pound or tons of total combined HAPs;

n. the rolling, 12-month summation of monthly coating usage, in gallons per rolling, 12-month period;

o. the rolling, 12-month summation of the monthly VOC emissions from all coatings, in pounds or tons per rolling, 12-month period;

p. the rolling, 12-month summation of the monthly individual HAP emissions for each HAP from all coating and cleanup material from emissions units K001, K002, K003, and P005 combined, in pounds or tons per rolling, 12-month period (for each HAP the sum of d. times h. for each coating and the sum of e. times i. for each cleanup material); and

q. the rolling, 12-month summation of the monthly total combined HAP emissions from all coating and cleanup material from emissions units K001, K002, K003, and P005 combined in pounds or tons per rolling, 12-month period (the sum of f. times h. for each coating plus the sum of g. times i. for each cleanup material).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials.

(2) The permittee shall collect and record the following information each year for this emission unit:

a. the OC containing cleanup material usage for the emissions unit, in gallons; and

b. the OC emissions from all OC containing cleanup material in this emissions unit, in pounds or tons of OC.

(3) The permittee shall maintain daily records that document the date any cleanup material containing VOCs was used and the quantity used.

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

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing that the VOC content of any coating exceeded the applicable limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days after the exceedance.

(3) 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 twelve months for each air contaminant source identified in this permit.

(4) The permittee shall submit quarterly deviation reports which identify all exceedances of the following:

a. the VOC content for coating material;

b. the rolling, 12-month coating usage limitation;

c. the rolling, 12-month VOC emission limitation;

d. the rolling, 12-month total individual HAP emission limitation from emissions units K001, K002, K003, and P005;

e. the rolling, 12-month combined HAP emissions limitation from emissions units K001, K002, K003, and P005;

f. any time periods when the dry filtration system was not in service when this emissions unit was in operation; and

g. the date any cleanup material containing VOCs was used and the quantity used.

These quarterly deviation reports shall be submitted to the Ohio EPA Central District Office by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during a calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.

(5) The permittee shall also submit annual reports that specify the total VOC, OC, and HAP(s) emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

f) Testing Requirements

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

a. <u>Emission Limitation</u>

VOC emissions shall not exceed 32.9 lbs/hr from coating materials

<u>Applicable Compliance Method</u>

Compliance with the short-term emission limitation shall be demonstrated by multiplying the maximum amount of coating used per hour (10 gal/hr, PTI application submitted 01/14/05) by the maximum VOC content of the coating (3.29 lbs/gal, PT application submitted 01/14/05).

b. Emission Limitation

OC emissions shall not exceed 6.59 lbs/hr and 8.24 tpy from cleanup materials

Applicable Compliance Method

Compliance with the short-term limitation shall be demonstrated by multiplying the maximum amount of cleanup material used per hour (1 gal/hr, PTI application submitted 01/14/05) by the maximum amount OC content of the cleanup material (6.59 lbs/gal, PTI application submitted 01/14/05).

c. Emission Limitation

VOC emissions shall not exceed 45 tons per rolling, 12-month summation

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and recordkeeping required in Section d)(1)o.

d. Emission Limitation

Single HAP emissions from K001, K002, K003, and P005 shall not exceed 9.9 tons per rolling, 12-month summation

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and recordkeeping required in Section d)(1)p.

e. Emission Limitation

Total combined HAP emissions from K001, K002, K003, and P005 shall not exceed 24.9 tons per rolling, 12-month summation

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and recordkeeping in Section d)(1)q.

g) Miscellaneous Requirements

(1) None.

3. K003, SILK SCREENING

Operations, Property and/or Equipment Description:

Three station silk screening operation

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. 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) [Established by PTI 01-08565, issued final 05/14/02]	Volatile organic compound (VOC) emissions shall not exceed 6 pounds per hour (lbs/hr) from coating material(s). Organic compound (OC) emissions shall not exceed 6.59 lbs/hr and 6.59 tons per year (tpy) from cleanup material(s). The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U) and OAC rule 3745-31-05(D). See b)(2)a.
b.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)b.
	OAC rule 3745-31-05(D)	VOC emissions shall not exceed 5 tons per year based on a rolling, 12-month

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[Established by PTI 01-08579, issued final 08/13/02]	summation of monthly emissions. See b)(2)c. – d.

(2) Additional Terms and Conditions

a. The hourly VOC emissions limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

b. The permittee shall not employ more than ten gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.

c. Individual hazardous air pollutant (HAP) emissions from all coating materials employed in emissions units K001, K002, K003, and P005 combined, shall not exceed 9.9 tons per rolling, 12-month period.

d. Combined HAP emissions from all coating materials employed in emissions units K001, K002, K003, and P005 combined, shall not exceed 24.9 tons per rolling, 12-month period.

c) Operational Restrictions

(1) The VOC content of any coating used in this emissions unit shall not exceed 6.0 pounds of VOC per gallon, excluding water and exempt solvents, as applied.

(2) The OC content of any cleanup material used in this emissions unit shall not exceed 6.69 pounds of OC per gallon, as applied.

(3) Any cleanup material used in this emissions unit shall not contain any VOCs, as defined by OAC rule 3745-21-01(B)(16).

(4) The total maximum annual coating usage shall not exceed 1667 gallons per rolling, 12-month summation of the coating usage figures.

(5) The total maximum annual cleanup material usage shall not exceed 2000 gallons per year.

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification of each coating employed, as applied;

b. the volume, in gallons, of each coating employed; and

c. the total volume, in gallons, of all coatings employed.

Any day where less than one gallon of coating is employed, a record which indicates that less than one gallon has been used is acceptable.

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

a. the name and identification number of each coating and cleanup material, as applied;

b. he VOC content of each coating, excluding water and exempt solvents, in pounds VOC per gallon, as applied;

c. the OC content of each cleanup material in pounds OC per gallon cleanup material, as applied;

d. the individual HAP content for each HAP of each coating in pounds of HAP per gallon of coating, as applied;

e. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;

f. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from d.);

g. the total combined HAP content of each cleanup material in pound of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from e.);

h. the total coating usage for the emissions unit, in gallons;

i. the total cleanup usage for the emissions unit, in gallons;

j. the VOC emissions from all coating used in this emissions unit, in pound or tons of VOC;

k. the OC emissions from all cleanup material used in this emissions unit, in pounds or tons of OC;

l. the individual HAP emissions for each HAP from all coating and cleanup material, in pounds or tons of individual HAP;

m. the total combined HAP emissions from all coating and cleanup material, in pound or tons of total combined HAPs;

n. the rolling, 12-month summation of monthly coating usage, in gallons per rolling, 12-month period;

o. the rolling, 12-month summation of the monthly VOC emissions from all coatings, in pounds or tons per rolling, 12-month period;

p. the rolling, 12-month summation of the monthly individual HAP emissions for each HAP from all coating and cleanup material from emissions units K001, K002, K003, and P005 combined, in pounds or tons per rolling, 12-month period (for each HAP the sum of d. times h. for each coating and the sum of e. times i. for each cleanup material); and

q. the rolling, 12-month summation of the monthly total combined HAP emissions from all coating and cleanup material from emissions units K001, K002, K003, and P005 combined in pounds or tons per rolling, 12-month period (the sum of f. times h. for each coating plus the sum of g. times i. for each cleanup material).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials.

(3) The permittee shall collect and record the following information each year for this emission unit:

a. the OC containing cleanup material usage for the emissions unit, in gallons; and

b. the OC emissions from all OC containing cleanup material in this emissions unit, in pounds or tons of OC.

(4) The permittee shall maintain daily records that document the date any cleanup material containing VOCs was used and the quantity used.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the emissions unit employs more than the applicable maximum daily coating usage limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

(3) 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 twelve months for each air contaminant source identified in this permit.

(4) The permittee shall submit quarterly deviation reports which identify all exceedances of the following:

a. the VOC content for coating material;

b. the rolling, 12-month coating usage limitation;

c. the rolling, 12-month VOC emission limitation;

d. the rolling, 12-month total individual HAP emission limitation from emissions units K001, K002, K003, and P005;

e. the rolling, 12-month combined HAP emissions limitation from emissions units K001, K002, K003, and P005;

f. any time periods when the dry filtration system was not in service when this emissions unit was in operation; and

g. the date any cleanup material containing VOCs was used and the quantity used.

These quarterly deviation reports shall be submitted to the Ohio EPA Central District Office by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during a calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.

(5) The permittee shall also submit annual reports that specify the total VOC, OC, and HAP(s) emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

f) Testing Requirements

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

a. <u>Emission Limitation</u>

VOC emissions shall not exceed 6 lbs/hr from coating materials

<u>Applicable Compliance Method</u>

Compliance with the short-term emission limitation shall be demonstrated by multiplying the maximum amount of coating used per hour (1 gal/hr, PTI application submitted 12/01/04) by the maximum VOC content of the coating (6 lbs/gal, PT application submitted 12/01/04).

b. Emission Limitation

OC emissions shall not exceed 6.59 lbs/hr and 8.24 tpy from cleanup materials

Applicable Compliance Method

Compliance with the short-term limitation shall be demonstrated by multiplying the maximum amount of cleanup material used per hour (1 gal/hr, PTI application submitted 12/01/04) by the maximum amount OC content of the cleanup material (6.6 lbs/gal, PTI application submitted 12/01/04).

c. Emission Limitation

VOC emissions shall not exceed 5 tons per rolling, 12-month summation

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and recordkeeping required in Section d)(1)o.

d. Emission Limitation

Single HAP emissions from K001, K002, K003, and P005 shall not exceed 9.9 tons per rolling, 12-month summation

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and recordkeeping required in Section d)(1)p.

e. Emission Limitation

Total combined HAP emissions from K001, K002, K003, and P005 shall not exceed 24.9 tons per rolling, 12-month summation

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and recordkeeping in Section d)(1)q.

g) Miscellaneous Requirements

(1) None.