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

3/10/2015

Certified Mail

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

William Wagner
NORFOLK AND SOUTHERN RAILWAY CO
1200 Peachtree Street, NE
Box 13
Atlanta, GA 30309

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

Facility ID: 0773010154
Permit Number: P0115459
Permit Type: Initial Installation
County: Scioto

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 Portsmouth Times. 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

Portsmouth City Health Dept., Air Pollution Unit
605 Washington Street
3rd Floor
Portsmouth, OH 45662

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 Portsmouth City Health Dept., Air Pollution Unit at (740)353-5156.

Sincerely,

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

Cc: U.S. EPA Region 5*Via E-Mail Notification*
Portsmouth; Kentucky; West Virginia

PUBLIC NOTICE
3/10/2015 Issuance of Draft Air Pollution Permit-To-Install and Operate

NORFOLK AND SOUTHERN RAILWAY CO
2435-M EIGHTH ST,
PORTSMOUTH, OH 45662
Scioto County
FACILITY DESC.: Line-Haul Railroads
PERMIT #: P0115459
PERMIT TYPE: Initial Installation
PERMIT DESC: Initial installation permit for K002: Track Maintenance Repair Shop (miscellaneous metal parts coating line) and K003: Car Shop Paint Booth (miscellaneous metal parts coating line with dry filtration system).

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: Cindy Charles, Portsmouth City Health Dept., Air Pollution Unit, 605 Washington Street 3rd Floor, Portsmouth, OH 45662. Ph: (740)353-5156

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   Netting Determination

2. Source Description:

   K002, Track Maintenance Repair Shop - miscellaneous metal parts coating line.
   K003, Car Shop Paint booth - miscellaneous metal parts coating line with dry filtration system.

3. Facility Emissions and Attainment Status:

   This facility has requested the use of the paint booth with fabric filter with a 98% control efficiency and limiting the paint usage to 9200 gallons per year in this emission unit (K003) & a 300 gallons paint usage limitation for emissions unit (K002) as a federally enforceable restriction in the permit to keep the PM and VOC emissions from the facility to less than 100 tpy to remain below Title V thresholds. Currently the facility has one coating operation permitted at the Portsmouth facility emissions unit K001-Outdoor spray painting of railway equipment which is currently in the renewal process identified as PTIO P0110448 and being processed as an administrative modification to add federally enforceable limits, 300 gallons paint usage limitation for source (K001). The total facility wide paint usage will be less than 9,800 gallons per year.

   Norfolk & Southern Railway Company (NSRC) - Portsmouth is located in Scioto County which is currently designated as attainment for all criteria pollutants.

4. Source Emissions:

   This PTIO will establish a federally enforceable limit with the requirement of a paint booth with fabric filter with 98% control efficiency for emissions unit K003. The use of this control device will limit PM emissions from this emission unit to 0.22 tons per year and the restriction on gallons of paint usage will limit VOC emissions to 14.22 tons per year. The PM emissions from emissions unit K001 will be limited to 0.361 tons per year and VOC to 0.461 tons per year due to the 300 gallon usage limitation.

5. Conclusion:

   The terms and conditions of this permit will establish federally enforceable limitations that will keep the permitted allowable VOC emissions below the threshold levels for Title V. New post October 2013 BAT guidance was used in establishing the terms and conditions of this permit because only one BAT can be chosen per pollutant therefore “source design” was chosen when the permittee chose to install a paint booth after completing a BAT analysis in February 2013 for emissions unit K003. BAT for K002 was chosen to have 0.04 ton per month averaged over a 12-month period for VOC emissions from coatings and 0.03 ton per month averaged over a 12-month period for PE from coatings.

6. Please provide additional notes or comments as necessary:

   None

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

Pollutant	Tons Per Year
VOC	14.58
PM	0.58

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
NORFOLK AND SOUTHERN RAILWAY CO

Facility ID:	0773010154
Permit Number:	P0115459
Permit Type:	Initial Installation
Issued:	3/10/2015
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
NORFOLK AND SOUTHERN RAILWAY CO

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. What does this permit-to-install and operate ("PTIO") allow me to do? 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them? 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
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? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6
13. Can I transfer this permit to a new owner or operator? 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7
15. What happens if a portion of this permit is determined to be invalid? 7
B. Facility-Wide Terms and Conditions 8
C. Emissions Unit Terms and Conditions 12
1. K002 13
2. K003 17

Authorization

Facility ID:	0773010154
Application Number(s):	A0048899, A0049580
Permit Number:	P0115459
Permit Description:	Initial installation permit for K002: Track Maintenance Repair Shop (miscellaneous metal parts coating line) and K003: Car Shop Paint Booth (miscellaneous metal parts coating line with dry filtration system).
Permit Type:	Initial Installation
Permit Fee:	$400.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	3/10/2015
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:

NORFOLK AND SOUTHERN RAILWAY CO
2435-M EIGHTH ST
PORTSMOUTH, OH 45662

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:

Portsmouth City Health Dept., Air Pollution Unit
605 Washington Street
3rd Floor
Portsmouth, OH 45662
(740)353-5156

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: P0115459
Permit Description: Initial installation permit for K002: Track Maintenance Repair Shop (miscellaneous metal parts coating line) and K003: Car Shop Paint Booth (miscellaneous metal parts coating line with dry filtration system).

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

Emissions Unit ID:	**K002**
Company Equipment ID:	K002
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K003**
Company Equipment ID:	K003
Superseded Permit Number:	
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 Portsmouth City Health Dept., Air Pollution Unit 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.

2. Facility-Wide Emission Limitations:

   a) Pursuant to OAC rule 3745-31-05(D), the combined emissions from emissions units K001, K002 and K003 shall not exceed:

      (1) 15.4 tons/year, based upon a rolling, 12-month summation for volatile organic compounds (VOC) from coatings;

      (2) 9.9 tons/year, based upon a rolling, 12-month summation for any individual hazardous air pollutant (HAP);

      (3) 24.9 tons/year, based upon a rolling, 12-month summation for total combined HAPs; and

      (4) 9,800 gallons of coating usage/year, based upon a rolling, 12-month summation.

   b) The permittee shall maintain monthly facility-wide records of the following information:

      (1) The total VOC emissions during the rolling, 12-month period, calculated by adding emissions for the present month to the preceding 11 months of operation for each emissions unit (K001 - K003), in tons. Monthly emission shall be calculated in accordance with section C.1.d) of this permit

      (2) The permittee shall collect the following information for all cleanup material applied:

         a. the name and identification number of each cleanup material employed;

         b. the VOC content of each cleanup material, in lbs VOC/gallon coating;

         c. the amount of cleanup material used less the amount recovered, in lbs;

         d. the total VOC emissions from all cleanup material, the summation of (b x c), in lbs/month; and

         e. the total rolling, 12-month summation for all cleanup materials used.

(3) The permittee shall collect and record the following information each month for all materials containing any HAP that are applied in the emissions unit(s):

a. the name and identification number/code of each coating, cleanup, and any other material containing any HAP;

b. the name/identification of each individual HAP contained in each material applied(and identified in (a) above) and the pound(s) of each HAP/gallon of each HAP-containing material applied;

c. the number of gallons of each coating, cleanup, and any other HAP-containing material applied during the month, less the amount recovered for cleanup;

d. for each individual HAP, the total emissions from all the materials employed during the month, in ton(s), i.e., for each individual HAP, the summation of the products of (b x c) for all the materials applied during the month, divided by 2,000 pounds;

e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from (d) above;

f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in (d) above, for the present month plus the previous 11 months of operation, in ton(s); and

g. the total combined HAP emissions during the rolling, 12-month period, i.e., the summation of all HAP emissions, as recorded in (e) above, for the present month plus the previous 11 months of operation, in ton(s).

A listing of HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting the Portsmouth Local Air Agency. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and clean up materials.

(4) The permittee shall maintain records of monthly coating usage and the rolling, 12-month summation of total coating usage, in gallons.

c) The permittee shall submit quarterly deviation (excursion) reports that identify:

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

a. all exceedances of the rolling, 12-month VOC emission limitations for all the coating, and cleanup materials employed;

b. all exceedances of the rolling, 12-month individual and/or total combined HAP(s) emission limitations for all the coating, and cleanup materials employed;

c. all exceedances of the rolling, 12-month coating usage limitation;

d. the probable cause of each deviation (excursion);

e. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

f. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Portsmouth Local Air Agency.

d) The permittee shall also submit annual reports that specify the total facility VOC emissions 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 the emissions units in the annual Fee Emission Report.

e) Compliance with the facility-wide coating usage and VOC/HAP emission limitations shall be demonstrated by the record keeping and reporting requirements specified in sections B.2.b) and B.2.c) above.

C. Emissions Unit Terms and Conditions

1. K002

Operations, Property and/or Equipment Description:

Track Maintenance Repair Shop - miscellaneous metal parts coating line.

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.	ORC 3704.03(T)	Volatile organic compound (VOC) emissions from coatings shall not exceed 0.04 ton per month averaged over a 12-month, rolling period. Particulate Emissions (PE) from coatings shall not exceed 0.03 ton per month averaged over a 12-month, rolling period. See b)(2)a.
b.	OAC rule 3745-17-11(A)(1)	See b)(2)b.
c.	OAC rule 3745-21-09(U)(1)(d)	See b)(2)c.
d.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V)	See facility-wide section B.2.

(2) Additional Terms and Conditions

a. The requirements of this rule include compliance with the requirements of OAC rule 3745-21-09(U)(1).

b. This emissions unit is exempt from the requirements of OAC rule 3745-17-11(C)(1) and (C)(2) pursuant to OAC rule 3745-17-11(A)(1)(i).

c. The VOC content of coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

c) Operational Restrictions

(1) The maximum annual coating usage for this emissions unit shall not exceed 300 gallons per year, based upon a rolling, 12-month summation of the coating usage figures. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table.

Month(s)	Maximum Allowable Cumulative Coating Usage
1	50
1-2	75
1-3	100
1-4	150
1-5	175
1-6	200
1-7	220
1-8	240
1-9	260
1-10	280
1-11	290
1-12	300

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

(2) The permittee shall not exceed a maximum allowable daily cumulative coating usage level of 5 gallons/day.

d) Monitoring and/or Recordkeeping Requirements

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

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

b. the VOC content of each coating employed, in pounds per gallon, as applied;

c. the number of gallons of each coating employed;

d. the total number of gallons of all the coatings employed; and

e. the total VOC emissions from all the coatings employed, in pounds, i.e., the sum of d)(1)b times d)(1)c for each coating employed.

The coating usage records shall be maintained for a minimum of 3 years.

(2) The permittee shall calculate and record the total annual VOC emissions from coatings i.e., the sum of the monthly VOC emission rates from the coating materials for the calendar year in d)(1)e.

(3) The permittee shall collect and record the daily cumulative coating usage level on a daily basis.

e) Reporting Requirements

(1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each monthly record showing the use of any coating greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the exceedance occurs.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the in the Authorization section of this permit. The PER shall cover a reporting period of not more than 12 months for each air contaminant source identified in this permit and shall include.

a. a statement as to whether the coating operation was in compliance with the daily coating usage limitation (5 gallons per day) and with the annual 12-month usage limitation (300 gallons per year); and

b. a statement as to whether the records of the coating usage demonstrated that annual emissions, as calculated in d)(2), did not exceed the tons per year VOC emission limitation.

(3) 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.

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>Emissions Limitation</u>:

The VOC content of coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the testing requirements specified in f)(2).

b. Emissions Limitation:

VOC emissions from coatings shall not exceed 0.04 ton per month averaged over a 12-month, rolling period.

Applicable Compliance Method:

Compliance with the ton per month emission limitation shall be demonstrated by the following equation below and record keeping requirements specified in d(2).

[(gallons of coating/yr) x (lbs/VOC/gallon content x ton/2000 lbs) x (1 year/12 months)]

c. Emission Limitation:

PE from coatings shall not exceed 0.03 ton per month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the ton per month emission limitation shall be demonstrated by the following equation below and record keeping requirements specified in d(2);

[(gallons of coating/yr) x (percent solids by weight) x (density in lb/gallon) x (coating transfer efficiency (1-0.75)) x (Ton/2000 lbs) x (1 year/ 12 months)]

(2) Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the VOC contents of the coatings. If, pursuant to section 11.4 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 formulationdata for that coating to demonstrate compliance until the USEPA provides alternativeanalytical procedures or alternative precision statements for Method 24.Method 24 of 40 CFR Part 60, Appendix A or formulation data shall be used to determine the VOC contents of the cleanup materials.

g) Miscellaneous Requirements

(1) None.

2. K003

Operations, Property and/or Equipment Description:

Car shop paint booth - miscellaneous metal parts coating line with dry filtration 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)e, d)(7), d)(8), d)(9), d)(10) 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. b)(1)f, d)(1) and e)(1)

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)	The exhaust from the prep station or spray booth must be fitted with filters demonstrated to achieve at least a 98 percent filter efficiency of paint overspray for particulate matter (PM). Volatile organic compound (VOC) emissions from coatings shall not exceed 1.18 tons per month averaged over a 12-month, rolling period. See b)(2)b.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (PE) from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-11(C)	See d)(4), d)(5) and d)(6).
d.	OAC rule 3745-21-09(U)(1)(d)	See b)(2)a.
e.	ORC rule 3704.03(F)(4)(d)	See d)(7), d)(8), d)(9), d)(10) and e)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V)	See facility-wide section B.2.

(2) Additional Terms and Conditions

a. The VOC content of coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

b. The requirements of this rule include compliance with the requirements of OAC rule 3745-21-09(U)(1).

c) Operational Restrictions

(1) The maximum annual coating usage for this emissions unit shall not exceed 9,200 gallons per year, based upon a rolling, 12-month summation of the coating usage figures.To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage
1	1500
1-2	3000
1-3	4500
1-4	6000
1-5	6500
1-6	7000
1-7	7500
1-8	8000
1-9	8500
1-10	8750
1-11	9000
1-12	9200

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

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

(3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with anymodifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

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

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

b. the VOC content of each coating employed, in pounds per gallon, as applied;

c. the number of gallons of each coating employed;

d. the total number of gallons of all the coatings employed; and

e. the total VOC emissions from all the coatings employed, in pounds, i.e., the sum of d)(1)b times d)(1)c for each coating employed.

The coating usage records shall be maintained for a minimum of 3 years.

(2) The permittee shall calculate and record the total annual VOC emissions from coatings i.e., the sum of the montlhy VOC emission rates from the coating materials for the calendar year in d)(1)e.

(3) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, and/or operating manual and/or in accordance with any documented modifications deemed necessary by the permittee. The inspection frequency shall be based upon the recommendation of the manufacturer.

(4) In addition to the recommended periodic inspections, the permitte shall conduct a comprehensive inspection of the dry filtration system at least once per year while coating operations are shut down and shall perform any needed needed maintenance and repair.

(5) The permittee shall maintain the following information for the dry filtration system:

a. documentation of the manufacturer's recommendations, instructions, or operating manual, along with documentation of any modifications deemed necessary by the permittee;

b. any period(s)of time when the dry filtration system was not in service when the emissions unit was in operation;

c. any period(s)of time (during coating operations) when the dry filtration system was not operating according to the manufacturer's recommendations and/or according to documented modifications to the manufacturer's recommendations deemed necessary by the permittee; and

d. records for each inspection (periodic and annual) of the dry filtration systemto include the following information:

i. the date of the inspection;

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

iii. a description of any maintenance and repairs performed and the date; and

iv. the name of person who performed the inspection.

The manufacturer's operation manual, along with any documented modifications determined necessary by the permittee, shall be maintained at the facility at all times. Records of malfunction, maintenance, and inspections of the dry filtration systemshall be maintained for a period of not less than five years from the date of record and shall be made available to the Ohio EPA upon request.

(6) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(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 Ohio EPA upon request.

(7) The PTIO application for this/these emissions unit(s), K003, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: xylene

TLV (mg/m3): 572.6

Maximum Hourly Emission Rate (lbs/hr): 12.95

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 50.50

MAGLC (ug/m3): 57,260

The permittee, has demonstrated that emissions of xylene, from emissions unit(s) K003, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(8) 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.

(9) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(10) 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 permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing the application of a coating with greater than 3.5 pounds VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of each such record and it shall be sent to the appropriate District Office or local air agency within 30 days following the end of the calendar month during which the non-compliant coating was applied.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered. The PER shall contain the following information:

a. a statement as to whether the records of the coating usage demonstrated that annual emissions, as calculated in d)(2), did not exceed the tons per year VOC emission limitation; and

b. any daily record showing that the dry particulate filter system was not in service when the emissions unit(s) was/were in operation.

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

(4) 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.

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>:

The VOC content of coatings employed shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

<u>Applicable Compliance Method</u>:

If required, compliance shall be demonstrated based upon the testing requirements specified in f)(2).

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

VOC emissions from coatings shall not exceed 1.18 tons per month averaged over a 12-month, rolling period.

<u>Applicable Compliance Method</u>:

Compliance with the tons per month emission limitation shall be demonstrated by the following equation below and record keeping requirements specified in d(2);

[(gallons of coating/yr) x (lbs/VOC/gallon content x ton/2000 lbs) x (1 year/12 months)]

c. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the above visible PE limitation shall be demonstrated by visible PE evaluations performed inaccordance with OAC rule 3745-17-03(B)(1) using the methods and proceduresspecified in Method 9 of 40 CFR Part 60, Appendix A.

(2) Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the VOC contents of the coatings. If, pursuant to section 11.4 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 formulationdata for that coating to demonstrate compliance until the USEPA provides alternativeanalytical procedures or alternative precision statements for Method 24.Method 24 of 40 CFR Part 60, Appendix A or formulation data shall be used to determine the VOC contents of the cleanup materials.

g) Miscellaneous Requirements

(1) None.