



3/12/2015

Certified Mail

JOHN SEIFERT
SEIFERT CONSTRUCTION
8663 LANCASTER NEW LEXINGTON
BREMEN, OH 43107

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0123000286
Permit Number: P0117600
Permit Type: Renewal
County: Fairfield

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
SEIFERT CONSTRUCTION**

Facility ID:	0123000286
Permit Number:	P0117600
Permit Type:	Renewal
Issued:	3/12/2015
Effective:	3/12/2015
Expiration:	3/12/2020



Division of Air Pollution Control
Permit-to-Install and Operate
for
SEIFERT CONSTRUCTION

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Final Permit-to-Install and Operate
SEIFERT CONSTRUCTION
Permit Number: P0117600
Facility ID: 0123000286
Effective Date: 3/12/2015

Authorization

Facility ID: 0123000286
Application Number(s): A0051715
Permit Number: P0117600
Permit Description: Renewal FEPTIO for two (2) spray booths with fabric filter, one (1) spray area, and two (2) blast units
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 3/12/2015
Effective Date: 3/12/2015
Expiration Date: 3/12/2020
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

SEIFERT CONSTRUCTION
225 LOGAN THORNVILLE RD
Bremen, OH 43107

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

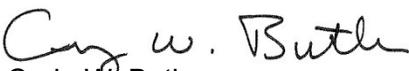
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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: P0117600
 Permit Description: Renewal FEPTIO for two (2) spray booths with fabric filter, one (1) spray area, and two (2) blast units

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

Emissions Unit ID: K003
 Company Equipment ID: SF
 Superseded Permit Number: P0104079
 General Permit Category and Type: Not Applicable

Group Name: Blast Units

Emissions Unit ID:	P001
Company Equipment ID:	Pangborn Shot Blaster
Superseded Permit Number:	P0115125
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	Blastroom 6 Clemco Blast Pots
Superseded Permit Number:	P0115077
General Permit Category and Type:	Not Applicable

Group Name: Spray Booths

Emissions Unit ID:	K001
Company Equipment ID:	Spray Booth No.1
Superseded Permit Number:	01-12135
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Spray Booth 2
Superseded Permit Number:	P0104079
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
SEIFERT CONSTRUCTION
Permit Number: P0117600
Facility ID: 0123000286
Effective Date: 3/12/2015

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 being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Final Permit-to-Install and Operate
SEIFERT CONSTRUCTION
Permit Number: P0117600
Facility ID: 0123000286
Effective Date: 3/12/2015

B. Facility-Wide Terms and Conditions



1. Facility-Wide Hazardous Air Pollutant Emissions

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the facility-wide 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 facility-wide 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)a, b)(2)a., d)(1), e)(2), and f)(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.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V)	See b)(2)a. below.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable limitations on emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, for the purpose of avoiding Title V permitting requirements:
 - i. The actual emissions from emissions units K001, K002, K003, and all other emission sources at the facility, including but not limited to any de minimis emissions units as defined in OAC rule 3745-15-05, or any registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 9.9 tons for any individual HAP, based upon a rolling, 12-month summation; and
 - ii. The actual emissions from emissions units K001, K002, K003, and all other emission sources at the facility, including but not limited to any de minimis emissions units as defined in OAC rule 3745-15-05, or any registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 24.9 tons



for the combination of all HAPs, based upon a rolling, 12-month summation.

- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect and record the following information each month for the purpose of calculating the rolling 12-month summation of HAP emissions:
 - a. for emission units K001, K002, and K003, the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;
 - b. for emission units K001, K002, and K003, the name/identification of each individual HAP contained in each material applied (and identified in (a) above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;
 - c. for emission units K001, K002, and K003, the number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;
 - d. for emission units K001, K002, and K003, for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of (b) times (c) for all the materials applied during the month, divided by 2,000 pounds;
 - e. for emission units K001, K002, and K003, 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. the total uncontrolled emissions of each individual HAP from any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, in tons, calculated in accordance with d)(1)d.;
 - g. the total uncontrolled emissions of combined HAPs from any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, in tons, calculated in accordance with d)(1)d.;
 - h. the total emissions of each individual HAP, i.e. the summation of the individual HAP emissions as recorded (d)(1)d. + d)(1)f. above);
 - i. the total emissions of combined HAP, i.e. the summation of the individual HAP emissions as recorded (d)(1)e. + d)(1)g. above);



- j. 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
- k. 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).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting Ohio EPA, Central District Office. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

e) Reporting Requirements

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the director, Ohio EPA, Central District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. individual HAP emissions for each HAP for all the coatings, thinners, additives, and cleanup materials employed shall not exceed, as a rolling, 12-month summation, 9.9 TPY and,
 - ii. combined HAP emissions for all HAPs from all the coatings, thinners, additives, and cleanup materials employed shall not exceed, as a rolling, 12-month summation, 24.9 TPY.

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

The quarterly reports shall be submitted, electronically through Ohio EPA's Air Services, each year by January 31 (covering October to December), April 30 (covering January to



March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the director (Ohio EPA, Central District Office).

[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

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. Emission Limitation:

Facility-wide emissions of any individual HAP shall not exceed 9.9 tons per rolling, 12-month period.

Facility-wide emissions of total combined HAPS shall not exceed 24.9 tons per rolling, 12-month period.

Applicable Compliance Method:

For any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, the permittee shall calculate HAP emissions consistent with the information presented in the installation and/or operating permit application using U.S. EPA approved emissions factors or emissions factors otherwise approved by Central District Office.

For emissions units K001, K002, and K003, the permittee shall determine HAP emissions based upon the record keeping requirements specified in d(1) of this permit.

g) Miscellaneous Requirements

(1) None.



Final Permit-to-Install and Operate
SEIFERT CONSTRUCTION
Permit Number: P0117600
Facility ID: 0123000286
Effective Date: 3/12/2015

C. Emissions Unit Terms and Conditions



1. K003, SF

Operations, Property and/or Equipment Description:

Shop Floor Spray Area.

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

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

a. d)(5) – d)(8), and e)(4).

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

a. b)(1)a., b)(2)a. - b)(2)b., and d)(2),- d)(3).

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) (P0104079, as issued 3/10/2009)	Emissions shall not exceed: 14.0 pounds per hour (lbs/hr) of volatile organic compounds (VOC) from coating operations. 29.0 lbs/hr of VOC from cleanup operations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D). See b)(2)e. below.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V)	VOC emissions from coating usage in emissions units K001, K002, and K003 combined shall not exceed, as a rolling, 12-month summation, 31.5 tons per year (TPY).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>See b)(2)a. below.</p> <p>VOC emissions from cleanup usage in emissions units K001, K002, and K003 combined shall not exceed, as a rolling, 12-month summation, 1.7 TPY.</p> <p>See b)(2)b. below.</p>
c.	OAC rule 3745-31-05(A)(3) June 30, 2008	<p>For emissions unit K003:</p> <p>Particulate emissions (PE) shall not exceed 0.551 lb/hr and 2.41 TPY.</p> <p>See b)(2)c. below.</p>
d.	OAC rule 3745-31-05(A)(3)(a)(ii)	<p>The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM10 and PM2.5 emissions from this air contaminant source since the potential to emit is less than 10 TPY.</p> <p>See b)(2)d. below.</p>
e.	OAC rule 3745-17-07(A)(1)	<p>Visible particulate emissions from the buildings serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.</p>
f.	OAC rule 3745-17-11(B)(1)	<p>PE from the openings of the building serving this emissions unit shall not exceed 0.551 lb/hr based on Table I which is more stringent than the allowable PE rate from Figure II.</p>
g.	OAC rule 3745-21-09(U)(1)(d)	<p>The VOC content of the finish coatings employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents; and the coatings shall not be dried at temperatures that exceed 200 degrees Fahrenheit.</p>
h.	ORC 3704.03(F)(4)(b) (Air Toxic Contaminants)	<p>See d)(5) - d)(8), and e)(3) below.</p>

(2) Additional Terms and Conditions

- a. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of



the coating usage, upon issuance of this permit. The maximum annual coating usage for this emissions unit shall not exceed 18,000 gallons per year, based upon a rolling, 12 month summation of the coating usage figures.

- b. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the cleanup usage, upon issuance of this permit. The maximum annual cleanup usage for this emissions unit shall not exceed 470 gallons per year, based upon a rolling, 12 month summation of the cleanup usage figures.
- c. The BAT emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 TPY BAT exemption) as part of the Ohio SIP.
- d. These requirements apply once U.S. EPA approves OAC paragraph 3745(A)(3)(a)(ii) (the less than 10 TPY BAT exemption) as part of the Ohio SIP.
- e. The hourly VOC emissions limit is established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for the coating or printing line and shall maintain this information at the facility for a period of three years:
 - a. the name and identification number of each coating, as applied;
 - b. the mass of VOC per volume of each coating, excluding water and exempt solvents, as applied.

This information does not have to be kept on a line-by-line basis. If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

[OAC rule 3745-21-09(B)(3)(f)]

- (2) The permittee shall collect and record the following information each month for emissions units K001, K002, and K003:
 - a. the name and identification of each coating material, as applied;
 - b. the VOC content for each coating material in pounds of VOC per gallon of coating material, excluding water and exempt solvents, as applied;



- c. the number of gallons applied, of each coating material, excluding water and exempt solvents, as applied;
 - d. the rolling, 12-month summation of the coating usage, in gallons, excluding water and exempt solvents;
 - e. the total VOC emissions rate for all coating materials, in pounds per month (b x c); and
 - f. the total VOC emissions rate for all coating materials, in pounds per rolling, 12-month summation (b x d).
- (3) The permittee shall collect and record the following information each month for emissions units K001, K002, and K003:
- a. the name and identification of each cleanup material, as applied;
 - b. the VOC content for each cleanup material in pounds of VOC per gallon of cleanup material, excluding water and exempt solvents, as applied;
 - c. the number of gallons applied, of each cleanup material, excluding water and exempt solvents, as applied;
 - d. the rolling, 12-month summation of the cleanup material usage, in gallons, excluding water and exempt solvents;
 - e. the total VOC emission rate for all cleanup materials, in pounds per month (b x c); and
 - f. the total VOC emissions rate for all cleanup materials, in pounds per rolling, 12-month summation (b x d).
- (4) If cleanup materials are collected for off-site disposal and/or recovery, the following records shall be maintained if a credit is to be applied to the monthly VOC emissions:
- a. the amount of cleanup material recovered during the month* for off-site disposal and/or recovery, in gallons (or pounds, if records of recovered cleanup material is maintained by weight and VOC content in percent by weight);
 - b. the VOC content of the recovered cleanup material shall be based on the lowest VOC content of any cleanup material collected, in pounds per gallon (or percent by weight); or it may be based upon a laboratory analyses provided by the facility to which the waste solvent is shipped;
 - c. the total VOC emissions (in pounds per month) of the recovered material shall be determined by multiplying total amount recovered times the VOC content of the recovered cleanup material [d)(4)a. x d)(4)b.].
 - d. the date the recovered cleanup material was shipped, the amount shipped (minus the container), and the name and address of the receiving, disposal, and/or recovery facility; and



- e. the total monthly VOC emissions from cleanup operations, in pounds, i.e., [d)(3)e.] – [d)(4)a. x d)(4)b.].

*A daily log may be required for recovered waste cleanup solvents, where a record of the monthly total volume or weight of the collected material cannot be accurately maintained. This amount shall be adjusted if the volume or weight shipped is less than the sum of the monthly recovered solvent added to the container.

- (5) The federally enforceable permit-to-install and operate (FEPTIO) application for this emissions unit, 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 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 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 or "worst case" toxic contaminant(s):

Toxic Contaminant: xylene

TLV (ug/m3): 434.1922

Maximum Hourly Emission Rate (lbs/hr): 2.3

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2492.18

MAGLC (ug/m3): 10331.91

The permittee, having demonstrated that emissions of xylene, from emissions unit K003, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit(s) at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and 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).

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (6) 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 concentrations, 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), ORC 3704.03(F), will be satisfied for the above changes, Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the (Toxic Air Contaminant Statute), ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in



greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the (Toxic Air Contaminant Statute):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the (Toxic Air Contaminant Statute), ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the (Toxic Air Contaminant Statute), ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the (Toxic Air Contaminant Statute), ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (8) 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. VOC emissions from coating usage in emissions units K001, K002, and K003 combined shall not exceed, as a rolling 12-month summation, 31.5 TPY; and



- ii. VOC emissions from cleanup usage in emissions units K001, K002, and K003 combined shall not exceed, as a rolling 12-month summation, 1.7 TPY;
 - iii. maximum annual coating usage for emissions units K001, K002, and K003 combined shall not exceed 18,000 gallons, based upon a rolling, 12-month summation of the coating usage figures; and
 - iv. maximum annual cleanup usage for emissions units K001, K002, and K003 combined shall not exceed 470 gallons, based upon a rolling, 12-month summation of the cleanup usage figures.
- b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA's Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the director (Ohio EPA, Central District Office).

[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

[OAC rule 3745-15-03(B)(2)] and [OAC rule 3745-15-03(D)]

- (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 Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], and Option A, Engineering Guide #70

- (4) The permittee shall notify the director (Ohio EPA, Central District Office) 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 Ohio EPA, Central District Office within 30 days following the end of the calendar month during which the non-compliant coating was applied.

[OAC rule 3745-21-09(B)(3)(g)]

- (5) The permittee shall notify the director (Ohio EPA, Central District Office) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the director (Ohio EPA, Central District Office) within 30 days following the end of the calendar month.

[OAC rule 3745-21-09(B)(3)(g)]

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. Emission Limitation:

14.0 lbs/hr of VOCs from coating operations.

Applicable Compliance Method:

Compliance is demonstrated by multiplying the maximum hourly coating usage rate of 4.0 gallons/hour by the maximum VOC content of 3.5 pounds/gallon.

b. Emission Limitation:

29.0 lbs/hr of VOC from cleanup operations.

Applicable Compliance Method

Compliance is demonstrated by multiplying the maximum hourly coating usage rate of 4.0 gallons/hour by the maximum VOC content of 7.2 pounds/gallon.

c. Emission Limitation:

VOC emissions from coating usage in emissions units K001, K002, and K003 combined shall not exceed, as a rolling, 12-month summation, 31.5 TPY.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d(2) of this permit.

d. Emission Limitation:

VOC emissions from cleanup usage in emissions units K001, K002, and K003 combined shall not exceed, as a rolling, 12-month summation, 1.7 TPY.



Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d(3) of this permit.

e. Emission Limitation:

PM shall not exceed 2.41 tons per year.

Applicable Compliance Method:

The annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the lb/hr emission limitation is maintained, compliance with the annual emission limitation shall be demonstrated.

f. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

g. Emission Limitation:

PE from the openings of the building serving this emissions unit shall not exceed 0.551 lb/hr based on Table I which is more stringent than the allowable PE rate from Figure II.

Applicable Compliance Method:

The emission limitation is established pursuant to the requirement specified in OAC rule 3745-17-11(B), Table I.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

h. Emission Limitation:

The VOC content of the finish coatings employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents; and the coatings shall not be dried at temperatures that exceed 200 degrees Fahrenheit.

Applicable Compliance Method:

Compliance shall be determined by the monitoring and recordkeeping established in Section d)(1).

In accordance with OAC rule 3745-21-10, U.S. EPA Method 24 shall be used to determine the VOC content of coatings and cleanup materials, where formulation



data is not based on the same method or if it is determined to be necessary by the director.

In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use U.S. EPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of U.S. EPA and shall use formulation data for that coating to demonstrate compliance until U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

- g) Miscellaneous Requirements
 - (1) None.



2. Emissions Unit Group -Blast Units: P001, P002,

EU ID	Operations, Property and/or Equipment Description
P001	Circular Blast Unit
P002	Blastroom 6 Clemco Blast Pots

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) (PTI No. 01-08504, as issued 12/06/2001)	Particulate emissions from P001 and P002 shall not exceed 2.57 pounds per hour and 11.26 tons per year combined. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1). See b)(2)a. below.
b.	OAC rule 3745-17-07(A)(1)	Visible emissions of particulate from the stack shall not exceed 20% opacity, except as provided by rule.
c.	OAC rule 3745-17-11(B)(1)	The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 374-31-05(A)(3).



- (2) Additional Terms and Conditions
 - a. Particulate emissions from the baghouse controlling particulate emissions from emissions units P001 and P002 shall not exceed 0.02 grains per dry standard cubic foot. (dscf)
 - b. The pressure drop across the baghouse controlling emissions from emissions units P001 and P002 shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
 - c. All abrasive blasting activity performed by this emissions unit shall occur within the total enclosure dedicated to this emissions unit.
 - d. All doors that are associated with the total enclosure containing this emissions unit shall remain closed while this emissions unit is in operation.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
 - (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operation log. If visible emissions are observed, the permittee shall also note the following in the operation log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operation;
 - c. if the emissions are not representative of normal operation, the cause of the abnormal emissions;
 - d. the total duration of any abnormal visible emission incident; and
 - e. any corrective actions taken to eliminate the abnormal emissions.
 - (3) The permittee may, upon receipt of written approval from Ohio EPA Central District Office, modify the above-mentioned visible particulate emissions check frequency if operating experience indicates that less frequent checks would be sufficient to ensure compliance with the visible particulate emissions requirements.



e) Reporting Requirements

- (1) Unless other arrangements have been approved by the director, all notifications and reports shall be submitted through Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

[OAC rule 3745-15-03(B)(2)] and [OAC rule 3745-15-03(D)]

- (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 Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], and Option A, Engineering Guide #70

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. Emissions Limitation:

Particulate emissions from P001 and P002 shall not exceed 2.57 pounds per hour and 0.02 gr/dscf combined,

Applicable Compliance Method:

The hourly emission limit is based on 0.02 gr/dscf, as follows:

$(0.02 \text{ gr/dscf})(1 \text{ lb}/7000 \text{ grains})(15,000 \text{ cf/min})(60 \text{ min/hr}) = 2.57 \text{ pounds per hour}$

If required pursuant to OAC rule 3745-15-04, the permittee shall demonstrate compliance with the hourly particulate emission limit of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, Appendix A, Method 5.

b. Emissions Limitation:

Particulate emissions shall not exceed 11.26 tons per year.

Applicable Compliance Method:

Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).



c. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.



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

EU ID	Operations, Property and/or Equipment Description
K001	Spray Booth No.1
K002	Spray Booth No.2.

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)g., and d)(10) - d)(13).

(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)b., b)(2)a., - b)(2)b., d)(2), - d)(3), and e)(2).

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) (PTI No. 01-12135 (K001), as issued 03/10/2009 and P0104079 (K002), as issued 03/10/2009)	Emissions shall not exceed: 14.0 lbs/hr of volatile organic compounds (VOC) from coating operations. 29.0 lbs/hr of VOC from cleanup operations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D). See b)(2)e. below.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V)	VOC emissions from coating usage in emissions units K001, K002, and K003 combined shall not exceed, as a rolling, 12-month summation, 31.5 TPY.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>See b)(2)a. below.</p> <p>VOC emissions from cleanup usage in emissions units K001, K002, and K003 combined shall not exceed, as a rolling, 12-month summation, 1.7 TPY.</p> <p>See b)(2)b. below.</p>
c.	<p>OAC rule 3745-31-05(A)(3) June 30, 2008</p>	<p>The PM10 and PM2.5 emissions shall be controlled by work place practice standards identified in sections c)(1), c)(2), and d)(6) through d)(10).</p> <p>The requirements of this rule are equivalent to the requirements of OAC rule 3745-17-11(C).</p> <p>See b)(2)f. below.</p>
d.	<p>OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008</p>	<p>The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM2.5 emissions from this air contaminant source since the potential to emit is less than 10 TPY.</p> <p>See b)(2)d. below.</p>
e.	<p>OAC rule 3745-17-11(C)</p>	<p>See b)(2)c., c)(1), c)(2) and d)(6) through d)(9) below.</p>
f.	<p>OAC rule 3745-21-09(U)(1)(d)</p>	<p>The VOC content of the finish coatings employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents; and the coatings shall not be dried at temperatures that exceed 200 degrees Fahrenheit.</p>
g.	<p>ORC 3704.03(F)(4)(b) (Air Toxic Contaminants)</p>	<p>See d)(10), - d)(13) below.</p>

(2) Additional Terms and Conditions

- a. These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the coating usage, upon issuance of this permit. The maximum annual coating usage for these emissions units shall not exceed 18,000 gallons, based upon a rolling, 12 month summation of the coating usage figures.



- b. These emissions units has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the cleanup usage, upon issuance of this permit. The maximum annual cleanup usage for these emissions units shall not exceed 470 gallons, based upon a rolling, 12 month summation of the cleanup usage figures.
- c. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

[OAC rule 3745-17-11(C)(1)]; [OAC rule 3745-31-05(D)]
- d. These requirements apply once U.S. EPA approves OAC paragraph 3745(A)(3)(a)(ii) (the less than 10 TPY BAT exemption) as part of the Ohio SIP.
- e. The hourly VOC emissions limit is established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.
- f. The BAT emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 TPY BAT exemption) as part of the Ohio SIP.

c) Operational Restrictions

- (1) 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 filterin accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-17-11(C)(2)(b)]; [OAC rule 3745-31-05(D)]
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee,the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-17-11(C)(2)(e)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for the coating or printing line and shall maintain this information at the facility for a period of three years:
 - a. the name and identification number or each coating, as applied;
 - b. the mass of VOC per volume of each coating, excluding water and exempt solvents, as applied.



This information does not have to be kept on a line-by-line basis. If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

[OAC rule 3745-21-09(B)(3)(f)]

- (2) The permittee shall collect and record the following information each month for emissions units K001, K002, and K003:
 - a. the name and identification of each coating material, as applied;
 - b. the VOC content for each coating material in pounds of VOC per gallon of coating material, excluding water and exempt solvents, as applied;
 - c. the number of gallons applied, of each coating material, excluding water and exempt solvents, as applied;
 - d. the rolling, 12-month summation of the coating usage, in gallons, excluding water and exempt solvents;
 - e. the total VOC emissions rate for all coating materials, in pounds per month (b x c); and
 - f. the total VOC emissions rate for all coating materials, in pounds per rolling, 12-month summation (b x d).

- (3) The permittee shall collect and record the following information each month for emissions units K001, K002, and K003:
 - a. the name and identification of each cleanup material, as applied;
 - b. the VOC content for each cleanup material in pounds of VOC per gallon of cleanup material, excluding water and exempt solvents, as applied;
 - c. the number of gallons applied, of each cleanup material, excluding water and exempt solvents, as applied;
 - d. the rolling, 12-month summation of the cleanup material usage, in gallons, excluding water and exempt solvents;
 - e. the total VOC emission rate for all cleanup materials, in pounds per month (b x c); and
 - f. the total VOC emissions rate for all cleanup materials, in pounds per rolling, 12-month summation (b x d).

- (4) If cleanup materials are collected for off-site disposal and/or recovery, the following records shall be maintained if a credit is to be applied to the monthly VOC emissions:



- a. the amount of cleanup material recovered during the month* for off-site disposal and/or recovery, in gallons (or pounds, if records of recovered cleanup material is maintained by weight and VOC content in percent by weight);
- b. the VOC content of the recovered cleanup material shall be based on the lowest VOC content of any cleanup material collected, in pounds per gallon (or percent by weight); or it may be based upon a laboratory analyses provided by the facility to which the waste solvent is shipped;
- c. the total VOC content (in pounds per month) of the recovered material shall be determined by multiplying total amount recovered times the VOC content of the recovered cleanup material [d)(4)a. x d)(4)b.].
- d. the date the recovered cleanup material was shipped, the amount shipped (minus the container), and the name and address of the receiving, disposal, and/or recovery facility; and
- e. the total monthly VOC emission from cleanup operations, in pounds, i.e., [d)(3)e.] – [d)(4)a. x d)(4)b.].

*A daily log may be required for recovered waste cleanup solvents, where a record of the monthly total volume or weight of the collected material cannot be accurately maintained. This amount shall be adjusted if the volume or weight shipped is less than the sum of the monthly recovered solvent added to the container.

- (5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to Ohio EPA, Central District Office, upon request.

[OAC 3745-17-11(C)(2)(a)]

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

[OAC rule 3745-17-11(C)(2)(c)]

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

[OAC rule 3745-17-11(C)(2)(c)]



- (8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to Ohio EPA, Central District Office, upon request.

[OAC rule 3745-17-11(C)(2)(d) and (f)]

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

[OAC rule 3745-17-11(C)(2)(f) and (g)]

- (10) The federally enforceable permit-to-install and operate (FEPTIO) application for this emissions units, K001 and K002, 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 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 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 or "worst case" toxic contaminant(s):

Toxic Contaminant: xylene

TLV (ug/m3): 434.1922

Maximum Hourly Emission Rate (lbs/hr): 2.22

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2410.81

MAGLC (ug/m3): 10331.91

The permittee, having demonstrated that emissions of xylene, from emissions unit K001, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit(s) at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and 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).

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

(11) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;



- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (12) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the (Toxic Air Contaminant Statute):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the (Toxic Air Contaminant Statute), ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the (Toxic Air Contaminant Statute), ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the (Toxic Air Contaminant Statute), ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (13) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the (Toxic Air Contaminant Statute), ORC 3704.03(F), through the predicted 1-hour maximum



ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

e) Reporting Requirements

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the director, Ohio EPA, Central District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. VOC emissions from coating usage in emissions units K001, K002, and K003 combined shall not exceed, as a rolling 12-month summation, 31.5 TPY;
 - ii. VOC emissions from cleanup usage in emissions units K001, K002, and K003 combined shall not exceed, as a rolling 12-month summation, 1.7 TPY;
 - iii. maximum annual coating usage for emissions units K001, K002, and K003 combined shall not exceed 18,000 gallons, based upon a rolling, 12-month summation of the coating usage figures; and
 - iv. maximum annual cleanup usage for emissions units K001, K002, and K003 combined shall not exceed 470 gallons, based upon a rolling, 12-month summation of the cleanup usage figures.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and



- d. the magnitude and duration of each deviation (excursion).

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

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

[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

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

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], and Option A, Engineering Guide #70

- (5) The permittee shall notify the director (Ohio EPA, Central District Office) 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 Ohio EPA, Central District Office within 30 days following the end of the calendar month during which the non-compliant coating was applied.

[OAC rule 3745-21-09(B)(3)(g)]

- (6) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[OAC rule 3745-21-09(B)(3)(g)]

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. Emission Limitation:

14.0 lbs/hr of volatile organic compounds (VOC) from coating operations.

Applicable Compliance Method:

Compliance is demonstrated by multiplying the maximum hourly coating usage rate of 4.0 gallons/hour by the maximum VOC content of 3.5 pounds/gallon.

b. Emission Limitation:

29.0 lbs/hr of VOC from cleanup operations.

Applicable Compliance Method:

Compliance is demonstrated by multiplying the maximum hourly coating usage rate of 4.0 gallons/hour by the maximum VOC content of 7.2 pounds/gallon.

c. Emission Limitation:

VOC emissions from coating usage in emissions units K001, K002, and K003 combined shall not exceed, as a rolling, 12-month summation, 31.5 TPY.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(2) of this permit.

d. Emission Limitation:

VOC emissions from cleanup usage in emissions units K001, K002, and K003 combined shall not exceed, as a rolling, 12-month summation, 1.7 TPY.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(3) of this permit.

e. Emission Limitation:

The PM₁₀ and PM_{2.5} emissions shall be controlled by work practice standards.

Applicable Compliance Method:

Compliance shall be determined by the monitoring and recordkeeping established in Sections d)(6), - d)(10) above.

f. Emission Limitation:

The VOC content of the finish coatings employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents; and the coatings shall not be dried at temperatures that exceed 200 degrees Fahrenheit.



Applicable Compliance Method:

Compliance shall be determined by the monitoring and recordkeeping established in Section d)(1).

In accordance with OAC rule 3745-21-10, U.S. EPA Method 24 shall be used to determine the VOC content of coatings and cleanup materials, where formulation data is not based on the same method or if it is determined to be necessary by the Director.

In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use U.S. EPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of U.S. EPA and shall use formulation data for that coating to demonstrate compliance until U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

g) Miscellaneous Requirements

- (1) None.