



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

8/19/2015

Certified Mail

Mr. Thomas Langhals
 Colonial Surface Solutions, Inc.
 4599 Campbell Rd
 Columbus Grove, OH 45830

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	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: 0302000208
 Permit Number: P0115418
 Permit Type: Initial Installation
 County: Allen

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, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: Ohio EPA-NWDO



Response to Comments

Facility ID:	0302000208
Facility Name:	Colonial Surface Solutions, Inc.
Facility Description:	Miscellaneous metals coating operation (farm equipment, buckets) and abrasive blasting operations
Facility Address:	4599 Campbell Road Columbus Grove, OH 45830 Allen County
Permit:	P0115418, Permit-To-Install and Operate - Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Lima News on 07/17/2015. The comment period ended on 08/16/2015.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

No comments received.



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Colonial Surface Solutions, Inc.**

Facility ID:	0302000208
Permit Number:	P0115418
Permit Type:	Initial Installation
Issued:	8/19/2015
Effective:	8/19/2015
Expiration:	1/12/2020



Division of Air Pollution Control
Permit-to-Install and Operate
for
Colonial Surface Solutions, Inc.

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Final Permit-to-Install and Operate
Colonial Surface Solutions, Inc.
Permit Number: P0115418
Facility ID: 0302000208
Effective Date: 8/19/2015

Authorization

Facility ID: 0302000208
Application Number(s): A0048838
Permit Number: P0115418
Permit Description: Initial installation permit to address emissions from coating and cleanup operations associated with custom manufacturing processes (i.e., one-off production, job production, etc.).
Permit Type: Initial Installation
Permit Fee: \$2,000.00
Issue Date: 8/19/2015
Effective Date: 8/19/2015
Expiration Date: 1/12/2020
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Colonial Surface Solutions, Inc.
4599 Campbell Road
Columbus Grove, OH 45830

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

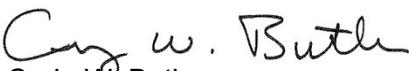
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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



Final Permit-to-Install and Operate
Colonial Surface Solutions, Inc.
Permit Number: P0115418
Facility ID: 0302000208
Effective Date: 8/19/2015

Authorization (continued)

Permit Number: P0115418
Permit Description: Initial installation permit to address emissions from coating and cleanup operations associated with custom manufacturing processes (i.e., one-off production, job production, etc.).

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

Emissions Unit ID:	K001
Company Equipment ID:	Building 51 - Paint Room S, Paint Room NNW, & Paint Room NNE
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Building 51 Line & Build 51 South Bay
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Building 41 Paint Shop
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K004
Company Equipment ID:	Building 81 Booth and Shop Floor
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P801
Company Equipment ID:	Facility-Wide Cleanup Solvents
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Colonial Surface Solutions, Inc.
Permit Number: P0115418
Facility ID: 0302000208
Effective Date: 8/19/2015

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
Colonial Surface Solutions, Inc.
Permit Number: P0115418
Facility ID: 0302000208
Effective Date: 8/19/2015

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



Final Permit-to-Install and Operate
Colonial Surface Solutions, Inc.
Permit Number: P0115418
Facility ID: 0302000208
Effective Date: 8/19/2015

C. Emissions Unit Terms and Conditions

1. K001, Building 51 - Paint Room S, Paint Room NNW, and Paint Room NNE

Operations, Property and/or Equipment Description:

Miscellaneous Metal Coating Operations (Building 51 - Paint Room S, Paint Room NNW, and Paint Room NNE)

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. c)(5) and c)(6).

(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., c)(1), c)(2), d)(2), d)(3), and e)(5).

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)	420 pounds volatile organic compounds (VOC) per day; 54.60 tons VOC per year
b.	OAC rule 3745-31-05(D)	90.0 tons volatile organic compounds (VOC) per rolling, 12-month period for emission units K001, K002, K003, K004, and P801, combined 9.0 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.0 tons per rolling, 12-month period for any combination of HAPs for emissions units K001, K002, K003, K004, and P801, combined See b)(2)a.
c.	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents
d.	OAC rule 3745-17-11(C)	See c)(3) and c)(4)

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for purposes of reflecting the potential to emit for coating operations associated with custom manufacturing processes (i.e. one-off production, job production, etc.):

i. 90 tons VOC per rolling, 12-month period for emission units K001, K002, K003, K004, and P801 combined.

The emission limitation is based on the material throughput restriction contained in c)(1).

ii. Emissions of hazardous air pollutants (HAP) shall not exceed the following for emission units K001, K002, K003, K004, and P801 combined:

(a) 9.0 tons per rolling, 12-month period for any single HAP; and

(b) 24.0 tons per rolling, 12-month period for total combined HAPs.

b. Best Available Technology (BAT) for this emissions unit has been determined to be compliance with the requirements established under OAC rule 3745-31-05(D) and compliance with OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-17-11(C).

c) Operational Restrictions

(1) The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, K004, and P801, combined, is limited by the following equation:

$$\sum_{M=1}^{12} [(V_i)(G_i)] \div 2000 \text{ lbs/ton} \leq 90.0$$

where,

M = the increment of the rolling, 12-month period;

V_i = VOC content in pounds per gallon of each coating and clean-up material employed;

G_i = Gallons used of each coating and clean-up material;

i = individual unique coatings and clean-up materials employed in emission units K001, K002, K003, K004, and P801

(2) To ensure federal enforceability during the first 12 calendar months of operation following issuance of this permit, the quantity of coating and cleanup materials employed

in emissions units K001, K002, K003, K004, and P801 combined is limited by the following:

Maximum Allowable Cumulative Material Usage

MONTH(S)	$\sum [(V_i)(G_i)] \div 2000 \text{ lbs/ton}$ Is less than or equal to
1-1	18
1-2	36
1-3	54
1-4	72
1-12	90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the material usage restriction shall be based upon a rolling 12-month summation.

- (3) The permittee shall install and operate dry filtration system(s) for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter(s) in accordance with the manufacturer’s recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (4) In the event the particulate filter system(s) is/are 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.
- (5) All exhaust stacks associated with coating operations for this emissions unit shall meet the following:
 - a. each stack must be vented vertically;
 - b. each stack must be unobstructed (i.e. no “rain cap”); and
 - c. each stack must be taller than the roof height of the accompanying building and/or taller than the roof height(s) of any adjacent building(s).
- (6) Prior to using any coating in this emissions unit, the permittee shall determine that the coating meets the toxic screening criteria as determined by steps contained in c)(6)a through c)(6)f. below:

- a. Step 1 - From information regarding the composition and/or ingredients for each coating to be used, such as a Material Safety Data Sheet (MSDS), coating specification sheet, etc., identify the following:
 - i. any of the chemical compounds contained in the coating that are listed as a toxic air contaminant in OAC rule 3745-114-01 (if a coating does not contain a toxic air contaminant it will not be necessary to complete the toxics screening criteria);
 - ii. if a coating contains a toxic air contaminant as identified in c)(6)a.i, the following information shall be determined on an as applied basis:
 - (a) the density of the coating, in pounds per gallon; and
 - (b) the percent by weight (wt%) of each chemical compound identified in c)(6)a.i. as contained in the coating.
- b. Step 2 - Determine the maximum coating application rate in gallons per hour based on the substrate being coated, the coverage/laydown rate, etc.;
- c. Step 3 - Determine the emission rate (in pounds per hour) for each toxic air contaminant identified in c)(6)a.i. by multiplying the maximum coating application rate in gallons per hour in c)(6)b., the coating density, in pounds per gallon identified in c)(6)a.ii.(a) and wt% for each chemical compound identified in c)(6)a.ii.(b) $\{[c)(6)b.] \times [c)(6)a.ii.(a)] \times [c)(6)a.ii.(b)]\}$;
- d. Step 4 - Determine if any of the toxic air contaminants in the coating are listed in the table below. If any of the toxic air contaminants are listed in the table, calculate the maximum annual emission of that chemical compound, in pounds per year, by multiplying the hourly emission rate in Step 3 above by a maximum operating schedule of 8,760 hours per year;

Chemical Compound	CAS	Molecular Weight (MW)	Allowed Emission Rate (lb/year)
arsenic compounds, as As	7440-38-2	74.92	1.70
benzene	71-43-2	78.11	1100
benzidine	92-87-5	184.23	5.60
benzo(a)pyrene	50-32-8	252.30	6.90
beryllium (and Be compounds)	7440-41-7	9.01	0.350
Cadmium	7440-43-9	112.4	5.20
Chromium	7440-47-3	varies	0.690
Hexachlorobenzene (HCB)	118-74-1	289.78	35.0
mercury (and Hg compounds)	7439-97-6	200.59	0.1
nickel (Ni subsulfide)	12035-72-2	240.19	17.0
Polychlorinateddibenzo-p-dioxins	1746-01-6	varies	0.030
Polychlorinated dibenzofurans	132-64-9	varies	0.030
polychlorinated biphenyls	1336-36-3	varies	87.0

Chemical Compound	CAS	Molecular Weight (MW)	Allowed Emission Rate (lb/year)
(PCBs, aroclors)			
vinyl chloride	75-01-4	62.50	2000

Determine if the calculated emission rate is below the allowable emission rate contained in the table above. If all of the toxic air contaminants emitted have a maximum annual emission less than the allowed rate, then move on to Step 5. If any of the air toxic contaminants are emitted at a rate higher than the allowed emission rate, contact your appropriate District Office or local air agency contact to determine if use of the coating would be permissible.

The procedures in Step 5 and Step 6 that follow do not apply to the air toxic contaminants identified in the table above.

- e. Step 5 – Find the Threshold Limit Value (TLV), in $\mu\text{g}/\text{m}^3$, as listed by the American Conference of Governmental Industrial Hygienists (ACGIH) for all air toxic contaminants identified in c)(6)a.i of Step 1. If the TLV is listed as parts per million (ppm), convert to $\mu\text{g}/\text{m}^3$ by using the following formula:

$$(\text{TLV in ppm}) \times (\text{molecular weight}) \times (1000)/24.45 = \text{TLV in } \mu\text{g}/\text{m}^3$$

- f. Step 6 – Compare the pound per hour emission rate for an air toxic contaminant as determined in c)(6)c. of Step 3 with the allowable emission rates for TLV ranges presented in the table below:

TLV Range ($\mu\text{g}/\text{m}^3$) (The TLV must be less than the high value listed and greater than or equal to the low value listed)	Allowed Emission Rate (lb/hr)
15	0.000067
30	0.0010
60	0.0020
120	0.0040
240	0.0080
480	0.0160
960	0.0320
1,920	0.0640
3,840	0.128
7,680	0.256
15,360	0.512
30,720	1.02
61,440	2.05
122,880	4.10
245,760	8.19

TLVRange ($\mu\text{g}/\text{m}^3$) (The TLV must be less than the high value listed and greater than or equal to the low value listed)		Allowed Emission Rate (lb/hr)
491,520	245,760	16.4
983,040	491,520	32.8
1,966,080	983,040	65.5
3,932,160	1,966,080	131

If all air toxic compounds contained in a coating are emitted at a rate less than the allowed emission rate, then the coating passes the toxic screening test and can be used under this permit. If one or more of the air toxic contaminants are emitted at a rate greater than the allowed emission rate, contact the appropriate District Office or local air agency to discuss other procedures for evaluating emissions of air toxic contaminants before use.

d) **Monitoring and/or Recordkeeping Requirements**

(1) The permittee shall collect and record the following information each day for all the coatings employed in emissions unit K001:

- a. the name and identification number of each coating employed;
- b. the number of gallons of each coating employed;
- c. the VOC content of each coating, as applied, in pounds per gallon;
- d. The daily volume-weighted average VOC content, excluding water and exempt solvents of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2;

Note: If the VOC content of each of the coatings employed during a day is less than 3.5 pounds per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

- e. the VOC emission rate for each coating employed [d)(1)b. x d)(1)c.], in pounds;
- f. the total VOC emission rate for all the coatings employed [summation of d)(1)e. for all coatings], in pounds.
- g. the annual year to date VOC emission rate for all coatings employed [summation of d)(1)f. for each day to date from January 1st to December 31st].

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions units.

(2) The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions unit K001, K002, K003, K004, and P801 combined:

- a. the name and identification number of each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the VOC content of each coating and cleanup material, as applied, in pounds per gallon;
- d. the VOC emission rate for each coating and cleanup material employed [d)(1)b. x d)(1)c.], in pounds;
- e. the total VOC emission rate for all the coatings and cleanup material employed [summation of d)(1)d. for all coatings and cleanup material], in pounds;
- f. during the first 12 calendar months of operation following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons; and
- g. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month VOC emissions, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions units.

- (3) The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K001, K002, K003, K004, and P801 combined:
- a. the company identification of each coating and cleanup material employed;
 - b. the pounds per gallon of each HAP in each coating and cleanup material, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the emission rate for each HAP from each coating and cleanup material employed [d)(3)b. x d)(3)c. in pounds per month];
 - e. the total emission rate for each HAP from all coatings and cleanup materials employed [summation of d)(3)d.] in pounds per month;
 - f. the total HAP emissions rate for all combined HAPs from all coatings and cleanup materials employed [summation of d)(3)e.] in pounds per month; and
 - g. the rolling, 12-month summations for each individual HAP and all combined HAPs emissions, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions units.

- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter(s), along with

documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permittee shall conduct periodic inspections of the dry particulate filter(s) to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (6) 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(s) 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.
- (7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system(s) and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

- (8) The permittee shall maintain records that document any time periods when the dry particulate filter(s) was/were not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter(s) was/were 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.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

- (3) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing a daily volume-weighted average 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.
- (4) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. 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 event occurs.
- (5) 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. all exceedances of the 420 pounds volatile organic compounds (VOC) per day for emissions unit K001;
 - ii. the first 12 months of operation following the issuance of this permit, all exceedances of the maximum cumulative quantity of material usage for emission units K001, K002, K003, K004, and P801 combined as specified in section c)(2);
 - iii. all exceedances of the 90 tons VOC per rolling, 12-month period for emission units K001, K002, K003, K004, and P801 combined;
 - iv. all exceedances of the 9.0 tons per rolling 12-month period for any single HAP for emission units K001, K002, K003, K004, and P801 combined;
 - v. all exceedances of the 24.0 tons per rolling, 12-month period for total combined HAPs for emission units K001, K002, K003, K004, and P801 combined;
 - 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.
- (6) 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 (the appropriate District Office or local air agency).

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: 420 pounds VOC per day; 54.60 tons VOC per year

Applicable Compliance Method: Compliance with the daily and annual VOC emission limitations above shall be demonstrated based on the monitoring and recordkeeping established in section d)(1) of this permit.

b. Emission Limitation: Daily volume-weighted average of 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents

Applicable Compliance Method: Compliance with the VOC emission limitation above shall be demonstrated based on the monitoring and recordkeeping established in section d)(1) of this permit.

c. Emission Limitation: 90 tons VOC per rolling 12-month period for emission units K001, K002, K003, K004, and P801 combined

Applicable Compliance Method: Compliance with the VOC emission limitation above shall be demonstrated based on the monitoring and recordkeeping established in section d)(2) of this permit.

d. Emission Limitation: 9.0 tons per rolling 12-month period for any single HAP for emission units K001, K002, K003, K004, and P801 combined

Applicable Compliance Method: Compliance with the VOC emission limitation above shall be demonstrated based on the monitoring and recordkeeping established in section d)(3) of this permit.

e. Emission Limitation: 24.0 tons per rolling 12-month period for total combined HAPs for emission units K001, K002, K003, K004, and P801 combined

Applicable Compliance Method: Compliance with the VOC emission limitation above shall be demonstrated based on the monitoring and recordkeeping established in section d)(3) of this permit.

g) Miscellaneous Requirements

(1) None.

2. K002, Building 51 Line & Build 51 South Bay

Operations, Property and/or Equipment Description:

Miscellaneous Metal Coating Operations (Building 51 - Conveyorized Line and Spray Booth)

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. c)(5) and c)(6).
 - (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., c)(1), c)(2), d)(2), d)(3), and e)(5).
- 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)	140 pounds volatile organic compounds (VOC) per day; 18.20 tons VOC per year
b.	OAC rule 3745-31-05(D)	90.0 tons volatile organic compounds (VOC) per rolling, 12-month period for emission units K001, K002, K003, K004, and P801 combined 9.0 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.0 tons per rolling, 12-month period for any combination of HAPs for emissions units K001, K002, K003, K004, and P801 combined See b)(2)a.
c.	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents
d.	OAC rule 3745-17-11(C)	See c)(3) and c)(4)

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for purposes of reflecting the potential to emit for coating operations associated with custom manufacturing processes (i.e. one-off production, job production, etc.):

i. 90 tons VOC per rolling, 12-month period for emission units K001, K002, K003, K004, and P801 combined.

The emission limitation is based on the material throughput restriction contained in c)(1).

ii. Emissions of hazardous air pollutants (HAP) shall not exceed the following for emission units K001, K002, K003, K004, and P801 combined:

(a) 9.0 tons per rolling, 12-month period for any single HAP; and

(b) 24.0 tons per rolling, 12-month period for total combined HAPs.

b. Best Available Technology (BAT) for this emissions unit has been determined to be compliance with the requirements established under OAC rule 3745-31-05(D) and compliance with OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-17-11(C).

c) Operational Restrictions

(1) The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, K004, and P801 combined is limited by the following equation:

$$\sum_{M=1}^{12} [(V_i)(G_i)] \div 2000 \text{ lbs/ton} \leq 90.0$$

where,

M = the increment of the rolling, 12-month period;

V_i = VOC content in pounds per gallon of each coating and clean-up material employed;

G_i = Gallons used of each coating and clean-up material;

i = individual unique coatings and clean-up materials employed in emission units K001, K002, K003, K004, and P801

- (2) To ensure federal enforceability during the first 12 calendar months of operation following issuance of this permit, the quantity of coating and cleanup materials employed in emissions units K001, K002, K003, K004, and P801 combined is limited by the following:

Maximum Allowable Cumulative Material Usage

MONTH(S)	$\sum [(V_i)(G_i)] \div 2000 \text{ lbs/ton}$ Is less than or equal to
1-1	18
1-2	36
1-3	54
1-4	72
1-12	90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the material usage restriction shall be based upon a rolling 12-month summation.

- (3) The permittee shall install and operate dry filtration system(s) for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter(s) in accordance with the manufacturer’s recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (4) In the event the particulate filter system(s) is/are 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.
- (5) All exhaust stacks associated with coating operations for this emissions unit shall meet the following:
- a. each stack must be vented vertically;
 - b. each stack must be unobstructed (i.e. no “rain cap”); and
 - c. each stack must be taller than the roof height of the accompanying building and/or taller than the roof height(s) of any adjacent building(s).

- (6) Prior to using any coating in this emissions unit, the permittee shall determine that the coating meets the toxic screening criteria as determined by steps contained in c)(6)a through c)(6)f. below:
- a. Step 1 - From information regarding the composition and/or ingredients for each coating to be used, such as a Material Safety Data Sheet (MSDS), coating specification sheet, etc., identify the following:
 - i. any of the chemical compounds contained in the coating that are listed as a toxic air contaminant in OAC rule 3745-114-01 (if a coating does not contain a toxic air contaminant it will not be necessary to complete the toxics screening criteria);
 - ii. if a coating contains a toxic air contaminant as identified in c)(6)a.i, the following information shall be determined on an as applied basis:
 - (a) the density of the coating, in pounds per gallon; and
 - (b) the percent by weight (wt%) of each chemical compound identified in c)(6)a.i. as contained in the coating.
 - b. Step 2 - Determine the maximum coating application rate in gallons per hour based on the substrate being coated, the coverage/laydown rate, etc.;
 - c. Step 3 - Determine the emission rate (in pounds per hour) for each toxic air contaminant identified in c)(6)a.i. by multiplying the maximum coating application rate in gallons per hour in c)(6)b., the coating density, in pounds per gallon identified in c)(6)a.ii.(a) and wt% for each chemical compound identified in c)(6)a.ii.(b) $\{[c)(6)b.] \times [c)(6)a.ii.(a)] \times [c)(6)a.ii.(b)]\}$;
 - d. Step 4 - Determine if any of the toxic air contaminants in the coating are listed in the table below. If any of the toxic air contaminants are listed in the table, calculate the maximum annual emission of that chemical compound, in pounds per year, by multiplying the hourly emission rate in Step 3 above by a maximum operating schedule of 8,760 hours per year;

Chemical Compound	CAS	Molecular Weight (MW)	Allowed Emission Rate (lb/year)
arsenic compounds, as As	7440-38-2	74.92	1.70
benzene	71-43-2	78.11	1100
benzidine	92-87-5	184.23	5.60
benzo(a)pyrene	50-32-8	252.30	6.90
beryllium (and Be compounds)	7440-41-7	9.01	0.350
Cadmium	7440-43-9	112.4	5.20
Chromium	7440-47-3	varies	0.690
Hexachlorobenzene (HCB)	118-74-1	289.78	35.0
mercury (and Hg compounds)	7439-97-6	200.59	0.1
nickel (Ni subsulfide)	12035-72-2	240.19	17.0

Chemical Compound	CAS	Molecular Weight (MW)	Allowed Emission Rate (lb/year)
Polychlorinated dibenzo-p-dioxins	1746-01-6	varies	0.030
Polychlorinated dibenzofurans	132-64-9	varies	0.030
polychlorinated biphenyls (PCBs, aroclors)	1336-36-3	varies	87.0
vinyl chloride	75-01-4	62.50	2000

Determine if the calculated emission rate is below the allowable emission rate contained in the table above. If all of the toxic air contaminants emitted have a maximum annual emission less than the allowed rate, then move on to Step 5. If any of the air toxic contaminants are emitted at a rate higher than the allowed emission rate, contact your appropriate District Office or local air agency contact to determine if use of the coating would be permissible.

The procedures in Step 5 and Step 6 that follow do not apply to the air toxic contaminants identified in the table above.

- e. Step 5 – Find the Threshold Limit Value (TLV), in $\mu\text{g}/\text{m}^3$, as listed by the American Conference of Governmental Industrial Hygienists (ACGIH) for all air toxic contaminants identified in c)(6)a.i of Step 1. If the TLV is listed as parts per million (ppm), convert to $\mu\text{g}/\text{m}^3$ by using the following formula:

$$(\text{TLV in ppm}) \times (\text{molecular weight}) \times (1000)/24.45 = \text{TLV in } \mu\text{g}/\text{m}^3$$

- f. Step 6 – Compare the pound per hour emission rate for an air toxic contaminant as determined in c)(6)c. of Step 3 with the allowable emission rates for TLV ranges presented in the table below:

TLV Range ($\mu\text{g}/\text{m}^3$) (The TLV must be less than the high value listed and greater than or equal to the low value listed)	Allowed Emission Rate (lb/hr)
15	0.000067
30	0.0010
60	0.0020
120	0.0040
240	0.0080
480	0.0160
960	0.0320
1,920	0.0640
3,840	0.128
7,680	0.256
15,360	0.512
30,720	1.02

TLV Range ($\mu\text{g}/\text{m}^3$) (The TLV must be less than the high value listed and greater than or equal to the low value listed)		Allowed Emission Rate (lb/hr)
61,440	30,720	2.05
122,880	61,440	4.10
245,760	122,880	8.19
491,520	245,760	16.4
983,040	491,520	32.8
1,966,080	983,040	65.5
3,932,160	1,966,080	131

If all air toxic compounds contained in a coating are emitted at a rate less than the allowed emission rate, then the coating passes the toxic screening test and can be used under this permit. If one or more of the air toxic contaminants are emitted at a rate greater than the allowed emission rate, contact the appropriate District Office or local air agency to discuss other procedures for evaluating emissions of air toxic contaminants before use.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for all the coatings employed in emissions unit K002:

- a. the name and identification number of each coating employed;
- b. the number of gallons of each coating employed;
- c. the VOC content of each coating, as applied, in pounds per gallon;
- d. The daily volume-weighted average VOC content, excluding water and exempt solvents of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2;

Note: If the VOC content of each of the coatings employed during a day is less than 3.5 pounds per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

- e. the VOC emission rate for each coating employed [d)(1)b. x d)(1)c.], in pounds;
- f. the total VOC emission rate for all the coatings employed [summation of d)(1)e. for all coatings], in pounds.
- g. the annual year to date VOC emission rate for all coatings employed [summation of d)(1)f. for each day to date from January 1st to December 31st].

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions units.

- (2) The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions unit K001, K002, K003, K004, and P801 combined:
- a. the name and identification number of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the VOC content of each coating and cleanup material, as applied, in pounds per gallon;
 - d. the VOC emission rate for each coating and cleanup material employed [d)(1)b. x d)(1)c.], in pounds;
 - e. the total VOC emission rate for all the coatings and cleanup material employed [summation of d)(1)d. for all coatings and cleanup material], in pounds;
 - f. during the first 12 calendar months of operation following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons; and
 - g. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month VOC emissions, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions units.

- (3) The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K001, K002, K003, K004, and P801 combined:
- a. the company identification of each coating and cleanup material employed;
 - b. the pounds per gallon of each HAP in each coating and cleanup material, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the emission rate for each HAP from each coating and cleanup material employed [d)(3)b. x d)(3)c. in pounds per month];
 - e. the total emission rate for each HAP from all coatings and cleanup materials employed [summation of d)(3)d.] in pounds per month;
 - f. the total HAP emissions rate for all combined HAPs from all coatings and cleanup materials employed [summation of d)(3)e.] in pounds per month; and
 - g. the rolling, 12-month summations for each individual HAP and all combined HAPs emissions, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions units.

- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter(s), along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (5) The permittee shall conduct periodic inspections of the dry particulate filter(s) to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (6) 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(s) 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.
- (7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system(s) and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

- (8) The permittee shall maintain records that document any time periods when the dry particulate filter(s) was/were not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter(s) was/were 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.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing a daily volume-weighted average 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.
- (4) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. 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 event occurs.
- (5) 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. all exceedances of the 140 pounds volatile organic compounds (VOC) per day for emissions unit K002;
 - ii. the first 12 months of operation following the issuance of this permit, all exceedances of the maximum cumulative quantity of material usage for emission units K001, K002, K003, K004, and P801 combined as specified in section c)(2);
 - iii. all exceedances of the 90 tons VOC per rolling, 12-month period for emission units K001, K002, K003, K004, and P801 combined;
 - iv. all exceedances of the 9.0 tons per rolling 12-month period for any single HAP for emission units K001, K002, K003, K004, and P801 combined;
 - v. all exceedances of the 24.0 tons per rolling, 12-month period for total combined HAPs for emission units K001, K002, K003, K004, and P801 combined;
 - 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.

- (6) 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 (the appropriate District Office or local air agency).
- 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: 140 pounds VOC per day; 18.20 tons VOC per year
- Applicable Compliance Method: Compliance with the daily VOC emission limitation above shall be demonstrated based on the monitoring and recordkeeping established in section d)(1) of this permit.
- b. Emission Limitation: Daily volume-weighted average of 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents
- Applicable Compliance Method: Compliance with the VOC emission limitation above shall be demonstrated based on the monitoring and recordkeeping established in section d)(1) of this permit.
- c. Emission Limitation: 90 tons VOC per rolling 12-month period for emission units K001, K002, K003, K004, and P801 combined
- Applicable Compliance Method: Compliance with the VOC emission limitation above shall be demonstrated based on the monitoring and recordkeeping established in section d)(2) of this permit.
- d. Emission Limitation: 9.0 tons per rolling 12-month period for any single HAP for emission units K001, K002, K003, K004, and P801 combined
- Applicable Compliance Method: Compliance with the VOC emission limitation above shall be demonstrated based on the monitoring and recordkeeping established in section d)(3) of this permit.
- e. Emission Limitation: 24.0 tons per rolling 12-month period for total combined HAPs for emission units K001, K002, K003, K004, and P801 combined
- Applicable Compliance Method: Compliance with the VOC emission limitation above shall be demonstrated based on the monitoring and recordkeeping established in section d)(3) of this permit.



Final Permit-to-Install and Operate
Colonial Surface Solutions, Inc.
Permit Number: P0115418
Facility ID: 0302000208
Effective Date: 8/19/2015

g) Miscellaneous Requirements

(1) None.

3. K003, Building 41 Paint Shop

Operations, Property and/or Equipment Description:

Miscellaneous Metal Coating Operations (Building 41 Paint Shop)

- 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. c)(5 and c)(6).
 - (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., c)(1), c)(2), d)(2), d)(3), and e)(5).
- 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)	45 pounds volatile organic compounds (VOC) per day; 5.85 tons VOC per year
b.	OAC rule 3745-31-05(D)	90.0 tons volatile organic compounds (VOC) per rolling, 12-month period for emission units K001, K002, K003, K004, and P801 combined 9.0 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.0 tons per rolling, 12-month period for any combination of HAPs for emissions units K001, K002, K003, K004, and P801 combined See b)(2)a.
b.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)c.
c.	OAC rule 3745-17-11(C)	See c)(3) and c)(4)

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for purposes of reflecting the potential to emit for coating operations associated with custom manufacturing processes (i.e. one-off production, job production, etc.):

i. 90 tons VOC per rolling, 12-month period for emission units K001, K002, K003, K004, and P801 combined.

The emission limitation is based on the material throughput restriction contained in c)(1).

ii. Emissions of hazardous air pollutants (HAP) shall not exceed the following for emission units K001, K002, K003, K004, and P801 combined:

(a) 9.0 tons per rolling, 12-month period for any single HAP; and

(b) 24.0 tons per rolling, 12-month period for total combined HAPs.

b. Best Available Technology (BAT) for this emissions unit has been determined to be compliance with the requirements established under OAC rule 3745-31-05(D) and compliance with OAC rule 3745-21-09(U)(2)(e)(iii) and OAC rule 3745-17-11(C).

c. The permittee shall not use more than 10 gallons of coating material per day.

c) Operational Restrictions

(1) The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, K004, and P801 combined is limited by the following equation:

$$\sum_{M=1}^{12} [(V_i)(G_i)] \div 2000 \text{ lbs/ton} \leq 90.0$$

where,

M = the increment of the rolling, 12-month period;

V_i = VOC content in pounds per gallon of each coating and clean-up material employed;

G_i = Gallons used of each coating and clean-up material;

i = individual unique coatings and clean-up materials employed in emission units K001, K002, K003, K004, and P801

(2) To ensure federal enforceability during the first 12 calendar months of operation following issuance of this permit, the quantity of coating and cleanup materials employed

in emissions units K001, K002, K003, K004, and P801 combined is limited by the following:

Maximum Allowable Cumulative Material Usage

MONTH(S)	$\sum [(V_i)(G_i)] \div 2000 \text{ lbs/ton}$ Is less than or equal to
1-1	18
1-2	36
1-3	54
1-4	72
1-12	90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the material usage restriction shall be based upon a rolling 12-month summation.

- (3) The permittee shall install and operate dry filtration system(s) for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter(s) in accordance with the manufacturer’s recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (4) In the event the particulate filter system(s) is/are 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.
- (5) All exhaust stacks associated with coating operations for this emissions unit shall meet the following:
 - a. each stack must be vented vertically;
 - b. each stack must be unobstructed (i.e. no “rain cap”); and
 - c. each stack must be taller than the roof height of the accompanying building and/or taller than the roof height(s) of any adjacent building(s).
- (6) Prior to using any coating in this emissions unit, the permittee shall determine that the coating meets the toxic screening criteria as determined by steps contained in c)(6)a through c)(6)f. below:

- a. Step 1 - From information regarding the composition and/or ingredients for each coating to be used, such as a Material Safety Data Sheet (MSDS), coating specification sheet, etc., identify the following:
 - i. any of the chemical compounds contained in the coating that are listed as a toxic air contaminant in OAC rule 3745-114-01 (if a coating does not contain a toxic air contaminant it will not be necessary to complete the toxics screening criteria);
 - ii. if a coating contains a toxic air contaminant as identified in c)(6)a.i, the following information shall be determined on an as applied basis:
 - (a) the density of the coating, in pounds per gallon; and
 - (b) the percent by weight (wt%) of each chemical compound identified in c)(6)a.i. as contained in the coating.
- b. Step 2 - Determine the maximum coating application rate in gallons per hour based on the substrate being coated, the coverage/laydown rate, etc.;
- c. Step 3 - Determine the emission rate (in pounds per hour) for each toxic air contaminant identified in c)(6)a.i. by multiplying the maximum coating application rate in gallons per hour in c)(6)b., the coating density, in pounds per gallon identified in c)(6)a.ii.(a) and wt% for each chemical compound identified in c)(6)a.ii.(b) $\{[c)(6)b.] \times [c)(6)a.ii.(a)] \times [c)(6)a.ii.(b)]\}$;
- d. Step 4 - Determine if any of the toxic air contaminants in the coating are listed in the table below. If any of the toxic air contaminants are listed in the table, calculate the maximum annual emission of that chemical compound, in pounds per year, by multiplying the hourly emission rate in Step 3 above by a maximum operating schedule of 8,760 hours per year;

Chemical Compound	CAS	Molecular Weight (MW)	Allowed Emission Rate (lb/year)
arsenic compounds, as As	7440-38-2	74.92	1.70
benzene	71-43-2	78.11	1100
benzidine	92-87-5	184.23	5.60
benzo(a)pyrene	50-32-8	252.30	6.90
beryllium (and Be compounds)	7440-41-7	9.01	0.350
Cadmium	7440-43-9	112.4	5.20
Chromium	7440-47-3	varies	0.690
Hexachlorobenzene (HCB)	118-74-1	289.78	35.0
mercury (and Hg compounds)	7439-97-6	200.59	0.1
nickel (Ni subsulfide)	12035-72-2	240.19	17.0
Polychlorinated dibenzo-p-dioxins	1746-01-6	varies	0.030
Polychlorinated dibenzofurans	132-64-9	varies	0.030
polychlorinated biphenyls	1336-36-3	varies	87.0

Chemical Compound	CAS	Molecular Weight (MW)	Allowed Emission Rate (lb/year)
(PCBs, aroclors)			
vinyl chloride	75-01-4	62.50	2000

Determine if the calculated emission rate is below the allowable emission rate contained in the table above. If all of the toxic air contaminants emitted have a maximum annual emission less than the allowed rate, then move on to Step 5. If any of the air toxic contaminants are emitted at a rate higher than the allowed emission rate, contact your appropriate District Office or local air agency contact to determine if use of the coating would be permissible.

The procedures in Step 5 and Step 6 that follow do not apply to the air toxic contaminants identified in the table above.

- e. Step 5 – Find the Threshold Limit Value (TLV), in $\mu\text{g}/\text{m}^3$, as listed by the American Conference of Governmental Industrial Hygienists (ACGIH) for all air toxic contaminants identified in c)(6)a.i of Step 1. If the TLV is listed as parts per million (ppm), convert to $\mu\text{g}/\text{m}^3$ by using the following formula:

$$(\text{TLV in ppm}) \times (\text{molecular weight}) \times (1000)/24.45 = \text{TLV in } \mu\text{g}/\text{m}^3$$

- f. Step 6 – Compare the pound per hour emission rate for an air toxic contaminant as determined in c)(6)c. of Step 3 with the allowable emission rates for TLV ranges presented in the table below:

TLV Range ($\mu\text{g}/\text{m}^3$) (The TLV must be less than the high value listed and greater than or equal to the low value listed)	Allowed Emission Rate (lb/hr)
15	0.000067
30	0.0010
60	0.0020
120	0.0040
240	0.0080
480	0.0160
960	0.0320
1,920	0.0640
3,840	0.128
7,680	0.256
15,360	0.512
30,720	1.02
61,440	2.05
122,880	4.10
245,760	8.19

TLVRange ($\mu\text{g}/\text{m}^3$) (The TLV must be less than the high value listed and greater than or equal to the low value listed)		Allowed Emission Rate (lb/hr)
491,520	245,760	16.4
983,040	491,520	32.8
1,966,080	983,040	65.5
3,932,160	1,966,080	131

If all air toxic compounds contained in a coating are emitted at a rate less than the allowed emission rate, then the coating passes the toxic screening test and can be used under this permit. If one or more of the air toxic contaminants are emitted at a rate greater than the allowed emission rate, contact the appropriate District Office or local air agency to discuss other procedures for evaluating emissions of air toxic contaminants before use.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for all the coatings employed in emissions unit K003:
 - a. the name and identification number of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the total number of gallons of all coatings employed;
 - d. the VOC content of each coating, as applied, in pounds per gallon;
 - e. the VOC emission rate for each coating employed [d)(1)b. x d)(1)d.], in pounds;
 - f. the total VOC emission rate for all the coatings employed [summation of d)(1)e. for all coatings], in pounds.
 - g. the annual year to date VOC emission rate for all coatings employed [summation of d)(1)f. for each day to date from January 1st to December 31st].

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions units.

- (2) The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions unit K001, K002, K003, K004, and P801 combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;

- c. the VOC content of each coating and cleanup material, as applied, in pounds per gallon;
- d. the VOC emission rate for each coating and cleanup material employed [d)(1)b. x d)(1)c.], in pounds;
- e. the total VOC emission rate for all the coatings and cleanup material employed [summation of d)(1)d. for all coatings and cleanup material], in pounds;
- f. during the first 12 calendar months of operation following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons; and
- g. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month VOC emissions, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions units.

- (3) The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K001, K002, K003, K004, and P801 combined:
 - a. the company identification of each coating and cleanup material employed;
 - b. the pounds per gallon of each HAP in each coating and cleanup material, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the emission rate for each HAP from each coating and cleanup material employed [d)(3)b. x d)(3)c. in pounds per month];
 - e. the total emission rate for each HAP from all coatings and cleanup materials employed [summation of d)(3)d.] in pounds per month;
 - f. the total HAP emissions rate for all combined HAPs from all coatings and cleanup materials employed [summation of d)(3)e.] in pounds per month; and
 - g. the rolling, 12-month summations for each individual HAP and all combined HAPs emissions, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions units.

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

- (5) The permittee shall conduct periodic inspections of the dry particulate filter(s) to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (6) 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(s) 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.
- (7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system(s) and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

- (8) The permittee shall maintain records that document any time periods when the dry particulate filter(s) was/were not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter(s) was/were 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.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
 - (3) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating operation employed more than the applicable maximum daily coating usage limit of 10 gallons per day. 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.

- (4) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. 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 event occurs.
- (5) 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. the first 12 months of operation following the issuance of this permit, all exceedances of the maximum cumulative quantity of material usage for emission units K001, K002, K003, K004, and P801 combined as specified in section c)(2);
 - ii. all exceedances of the 90 tons VOC per rolling, 12-month period for emission units K001, K002, K003, K004, and P801 combined;
 - iii. all exceedances of the 9.0 tons per rolling 12-month period for any single HAP for emission units K001, K002, K003, K004, and P801 combined;
 - iv. all exceedances of the 24.0 tons per rolling, 12-month period for total combined HAPs for emission units K001, K002, K003, K004, and P801 combined;
 - 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.
- (6) 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 (the appropriate District Office or local air agency).

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: 45 pounds VOC per day; 5.85 tons VOC per year

Applicable Compliance Method: Compliance with the daily and annual VOC emission limitations above shall be demonstrated based on the monitoring and recordkeeping established in section d)(1) of this permit.

b. Emission Limitation: 10 gallons per day total coating usage

Applicable Compliance Method: Compliance with the daily and annual VOC emission limitations above shall be demonstrated based on the monitoring and recordkeeping established in section d)(1) of this permit.

c. Emission Limitation: 90 tons VOC per rolling 12-month period for emission units K001, K002, K003, K004, and P801 combined

Applicable Compliance Method: Compliance with the VOC emission limitation above shall be demonstrated based on the monitoring and recordkeeping established in section d)(2) of this permit.

d. Emission Limitation: 9.0 tons per rolling 12-month period for any single HAP for emission units K001, K002, K003, K004, and P801 combined

Applicable Compliance Method: Compliance with the VOC emission limitation above shall be demonstrated based on the monitoring and recordkeeping established in section d)(3) of this permit.

e. Emission Limitation: 24.0 tons per rolling 12-month period for total combined HAPs for emission units K001, K002, K003, K004, and P801 combined

Applicable Compliance Method: Compliance with the VOC emission limitation above shall be demonstrated based on the monitoring and recordkeeping established in section d)(3) of this permit.

g) Miscellaneous Requirements

(1) None.

4. K004, Building 81 Booth and Shop Floor

Operations, Property and/or Equipment Description:

Miscellaneous Metal Coating Operations (Building 81 Spray Booth & Shop Floor)

- 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. c)(5) and c)(6)
 - (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., c)(1), c)(2), d)(2), d)(3), and e)(5).
- 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)	See b)(2)b.
b.	OAC rule 3745-31-05(D)	90.0 tons volatile organic compounds (VOC) per rolling, 12-month period for emission units K001, K002, K003, K004, and P801 combined 9.0 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.0 tons per rolling, 12-month period for any combination of HAPs for emissions units K001, K002, K003, K004, and P801 combined See b)(2)a.
b.	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents
c.	OAC rule 3745-17-11(C)	See c)(3) and c)(4)

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for purposes of reflecting the potential to emit for coating operations associated with custom manufacturing processes (i.e. one-off production, job production, etc.):

i. 90 tons VOC per rolling, 12-month period for emission units K001, K002, K003, K004, and P801 combined.

The emission limitation is based on the material throughput restriction contained in c)(1).

ii. Emissions of hazardous air pollutants (HAP) shall not exceed the following for emission units K001, K002, K003, K004, and P801 combined:

(a) 9.0 tons per rolling, 12-month period for any single HAP; and

(b) 24.0 tons per rolling, 12-month period for total combined HAPs.

b. The Best Available Technology (BAT) requirements established pursuant to ORC rule 3704.03(T) have been determined to be equivalent to the coating content restriction established under OAC rule 3745-21-09(U)(1)(c) - 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

c) Operational Restrictions

(1) The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, K004, and P801 combined is limited by the following equation:

$$\sum_{M=1}^{12} [(V_i)(G_i)] \div 2000 \text{ lbs/ton} \leq 90.0$$

where,

M = the increment of the rolling, 12-month period;

V_i = VOC content in pounds per gallon of each coating and clean-up material employed;

G_i = Gallons used of each coating and clean-up material;

i = individual unique coatings and clean-up materials employed in emission units K001, K002, K003, K004, and P801

(2) To ensure federal enforceability during the first 12 calendar months of operation following issuance of this permit, the quantity of coating and cleanup materials employed

in emissions units K001, K002, K003, K004, and P801 combined is limited by the following:

Maximum Allowable Cumulative Material Usage

MONTH(S)	$\sum [(V_i)(G_i)] \div 2000 \text{ lbs/ton}$ Is less than or equal to
1-1	18
1-2	36
1-3	54
1-4	72
1-12	90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the material usage restriction shall be based upon a rolling 12-month summation.

- (3) The permittee shall install and operate dry filtration system(s) for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter(s) in accordance with the manufacturer’s recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (4) In the event the particulate filter system(s) is/are 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.
- (5) All exhaust stacks associated with coating operations for this emissions unit shall meet the following:
 - a. each stack must be vented vertically;
 - b. each stack must be unobstructed (i.e. no “rain cap”); and
 - c. each stack must be taller than the roof height of the accompanying building and/or taller than the roof height(s) of any adjacent building(s).
- (6) Prior to using any coating in this emissions unit, the permittee shall determine that the coating meets the toxic screening criteria as determined by steps contained in c)(6)a through c)(6)f. below:

- a. Step 1 - From information regarding the composition and/or ingredients for each coating to be used, such as a Material Safety Data Sheet (MSDS), coating specification sheet, etc., identify the following:
 - i. any of the chemical compounds contained in the coating that are listed as a toxic air contaminant in OAC rule 3745-114-01 (if a coating does not contain a toxic air contaminant it will not be necessary to complete the toxics screening criteria);
 - ii. if a coating contains a toxic air contaminant as identified in c)(6)a.i, the following information shall be determined on an as applied basis:
 - (a) the density of the coating, in pounds per gallon; and
 - (b) the percent by weight (wt%) of each chemical compound identified in c)(6)a.i. as contained in the coating.
- b. Step 2 - Determine the maximum coating application rate in gallons per hour based on the substrate being coated, the coverage/laydown rate, etc.;
- c. Step 3 - Determine the emission rate (in pounds per hour) for each toxic air contaminant identified in c)(6)a.i. by multiplying the maximum coating application rate in gallons per hour in c)(6)b., the coating density, in pounds per gallon identified in c)(6)a.ii.(a) and wt% for each chemical compound identified in c)(6)a.ii.(b) $\{[c)(6)b.] \times [c)(6)a.ii.(a)] \times [c)(6)a.ii.(b)]\}$;
- d. Step 4 - Determine if any of the toxic air contaminants in the coating are listed in the table below. If any of the toxic air contaminants are listed in the table, calculate the maximum annual emission of that chemical compound, in pounds per year, by multiplying the hourly emission rate in Step 3 above by a maximum operating schedule of 8,760 hours per year;

Chemical Compound	CAS	Molecular Weight (MW)	Allowed Emission Rate (lb/year)
arsenic compounds, as As	7440-38-2	74.92	1.70
benzene	71-43-2	78.11	1100
benzidine	92-87-5	184.23	5.60
benzo(a)pyrene	50-32-8	252.30	6.90
beryllium (and Be compounds)	7440-41-7	9.01	0.350
Cadmium	7440-43-9	112.4	5.20
Chromium	7440-47-3	varies	0.690
Hexachlorobenzene (HCB)	118-74-1	289.78	35.0
mercury (and Hg compounds)	7439-97-6	200.59	0.1
nickel (Ni subsulfide)	12035-72-2	240.19	17.0
Polychlorinated dibenzo-p-dioxins	1746-01-6	varies	0.030
Polychlorinated dibenzofurans	132-64-9	varies	0.030
polychlorinated biphenyls	1336-36-3	varies	87.0

Chemical Compound	CAS	Molecular Weight (MW)	Allowed Emission Rate (lb/year)
(PCBs, aroclors)			
vinyl chloride	75-01-4	62.50	2000

Determine if the calculated emission rate is below the allowable emission rate contained in the table above. If all of the toxic air contaminants emitted have a maximum annual emission less than the allowed rate, then move on to Step 5. If any of the air toxic contaminants are emitted at a rate higher than the allowed emission rate, contact your appropriate District Office or local air agency contact to determine if use of the coating would be permissible.

The procedures in Step 5 and Step 6 that follow do not apply to the air toxic contaminants identified in the table above.

- e. Step 5 – Find the Threshold Limit Value (TLV), in $\mu\text{g}/\text{m}^3$, as listed by the American Conference of Governmental Industrial Hygienists (ACGIH) for all air toxic contaminants identified in c)(6)a.i of Step 1. If the TLV is listed as parts per million (ppm), convert to $\mu\text{g}/\text{m}^3$ by using the following formula:

$$(\text{TLV in ppm}) \times (\text{molecular weight}) \times (1000)/24.45 = \text{TLV in } \mu\text{g}/\text{m}^3$$

- f. Step 6 – Compare the pound per hour emission rate for an air toxic contaminant as determined in c)(6)c. of Step 3 with the allowable emission rates for TLV ranges presented in the table below:

TLV Range ($\mu\text{g}/\text{m}^3$) (The TLV must be less than the high value listed and greater than or equal to the low value listed)	Allowed Emission Rate (lb/hr)
15	0.000067
30	0.0010
60	0.0020
120	0.0040
240	0.0080
480	0.0160
960	0.0320
1,920	0.0640
3,840	0.128
7,680	0.256
15,360	0.512
30,720	1.02
61,440	2.05
122,880	4.10
245,760	8.19

TLV Range ($\mu\text{g}/\text{m}^3$) (The TLV must be less than the high value listed and greater than or equal to the low value listed)		Allowed Emission Rate (lb/hr)
491,520	245,760	16.4
983,040	491,520	32.8
1,966,080	983,040	65.5
3,932,160	1,966,080	131

If all air toxic compounds contained in a coating are emitted at a rate less than the allowed emission rate, then the coating passes the toxic screening test and can be used under this permit. If one or more of the air toxic contaminants are emitted at a rate greater than the allowed emission rate, contact the appropriate District Office or local air agency to discuss other procedures for evaluating emissions of air toxic contaminants before use.

d) **Monitoring and/or Recordkeeping Requirements**

(1) The permittee shall collect and record the following information each day for all the coatings employed in emissions unit K004:

- a. the name and identification number of each coating employed;
- b. The daily volume-weighted average VOC content, excluding water and exempt solvents of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2;

Note: If the VOC content of each of the coatings employed during a day is less than 3.5 pounds per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions units.

(2) The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions unit K001, K002, K003, K004, and P801 combined:

- a. the name and identification number of each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the VOC content of each coating and cleanup material, as applied, in pounds per gallon;
- d. the VOC emission rate for each coating and cleanup material employed [d)(1)b. x d)(1)c.], in pounds;

- e. the total VOC emission rate for all the coatings and cleanup material employed [summation of d)(1)d. for all coatings and cleanup material], in pounds;
- f. during the first 12 calendar months of operation following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons; and
- g. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month VOC emissions, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions units.

- (3) The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K001, K002, K003, K004, and P801 combined:
 - a. the company identification of each coating and cleanup material employed;
 - b. the pounds per gallon of each HAP in each coating and cleanup material, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the emission rate for each HAP from each coating and cleanup material employed [d)(3)b. x d)(3)c. in pounds per month];
 - e. the total emission rate for each HAP from all coatings and cleanup materials employed [summation of d)(3)d.] in pounds per month;
 - f. the total HAP emissions rate for all combined HAPs from all coatings and cleanup materials employed [summation of d)(3)e.] in pounds per month; and
 - g. the rolling, 12-month summations for each individual HAP and all combined HAPs emissions, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions units.

- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter(s), along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (5) The permittee shall conduct periodic inspections of the dry particulate filter(s) to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

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

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

- (8) The permittee shall maintain records that document any time periods when the dry particulate filter(s) was/were not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter(s) was/were 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.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
 - (3) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing a daily volume-weighted average 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.
 - (4) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. 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 event occurs.

- (5) 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. the first 12 months of operation following the issuance of this permit, all exceedances of the maximum cumulative quantity of material usage for emission units K001, K002, K003, K004, and P801 combined as specified in section c)(2);
 - ii. all exceedances of the 90 tons VOC per rolling, 12-month period for emission units K001, K002, K003, K004, and P801 combined;
 - iii. all exceedances of the 9.0 tons per rolling 12-month period for any single HAP for emission units K001, K002, K003, K004, and P801 combined;
 - iv. all exceedances of the 24.0 tons per rolling, 12-month period for total combined HAPs for emission units K001, K002, K003, K004, and P801 combined;
 - 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.

- (6) 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 (the appropriate District Office or local air agency).

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: Daily volume-weighted average of 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents

Applicable Compliance Method: Compliance with the VOC emission limitation above shall be demonstrated based on the monitoring and recordkeeping established in section d)(1) of this permit.



- b. Emission Limitation: 90 tons VOC per rolling 12-month period for emission units K001, K002, K003, K004, and P801 combined

Applicable Compliance Method: Compliance with the VOC emission limitation above shall be demonstrated based on the monitoring and recordkeeping established in section d)(2) of this permit.

- c. Emission Limitation: 9.0 tons per rolling 12-month period for any single HAP for emission units K001, K002, K003, K004, and P801 combined

Applicable Compliance Method: Compliance with the VOC emission limitation above shall be demonstrated based on the monitoring and recordkeeping established in section d)(3) of this permit.

- d. Emission Limitation: 24.0 tons per rolling 12-month period for total combined HAPs for emission units K001, K002, K003, K004, and P801 combined

Applicable Compliance Method: Compliance with the VOC emission limitation above shall be demonstrated based on the monitoring and recordkeeping established in section d)(3) of this permit.

g) Miscellaneous Requirements

- (1) None.

5. P801, Facility-Wide Cleanup Solvents

Operations, Property and/or Equipment Description:

Cleanup Operations (Facility-Wide)

- 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. c)(5) and c)(6).
 - (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., c)(1), c)(2), d)(2), d)(3), and e)(5).
- 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)	1.5 tons volatile organic compounds (VOC) per month, averaged over a twelve-month rolling period
b.	OAC rule 3745-31-05(D)	90.0 tons VOC per rolling, 12-month period for emission units K001, K002, K003, K004, and P801 combined 9.0 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.0 tons per rolling, 12-month period for any combination of HAPs for emissions units K001, K002, K003, K004, and P801 combined See b)(2)a.

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for purposes of reflecting the potential to emit for coating operations associated with custom manufacturing processes (i.e. one-off production, job production, etc.):

i. 90 tons VOC per rolling, 12-month period for emission units K001, K002, K003, K004, and P801 combined.

The emission limitation is based on the material throughput restriction contained in c)(1).

ii. Emissions of hazardous air pollutants (HAP) shall not exceed the following for emission units K001, K002, K003, K004, and P801 combined:

(a) 9.0 tons per rolling, 12-month period for any single HAP; and

(b) 24.0 tons per rolling, 12-month period for total combined HAPs.

b. The Best Available Technology (BAT) requirements established pursuant to ORC rule 3704.03(T) have been determined to be equivalent to the coating content restriction established under OAC rule 3745-21-09(U)(1)(c) - 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

c) Operational Restrictions

(1) The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, K004, and P801 combined is limited by the following equation:

$$\sum_{M=1}^{12} [(V_i)(G_i)] \div 2000 \text{ lbs/ton} \leq 90.0$$

where,

M = the increment of the rolling, 12-month period;

V_i = VOC content in pounds per gallon of each coating and clean-up material employed;

G_i = Gallons used of each coating and clean-up material;

i = individual unique coatings and clean-up materials employed in emission units K001, K002, K003, K004, and P801

(2) To ensure federal enforceability during the first 12 calendar months of operation following issuance of this permit, the quantity of coating and cleanup materials employed

in emissions units K001, K002, K003, K004, and P801 combined is limited by the following:

Maximum Allowable Cumulative Material Usage

MONTH(S)	$\sum [(V_i)(G_i)] \div 2000 \text{ lbs/ton}$ Is less than or equal to
1-1	18
1-2	36
1-3	54
1-4	72
1-12	90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the material usage restriction shall be based upon a rolling 12-month summation.

- (3) All exhaust stacks associated with cleanup operations for this emissions unit shall meet the following:
 - a. each stack must be vented vertically;
 - b. each stack must be unobstructed (i.e. no “rain cap”); and
 - c. each stack must be taller than the roof height of the accompanying building and/or taller than the roof height(s) of any adjacent building(s).

- (4) Prior to using any cleanup material, the permittee shall determine that the cleanup material meets the toxic screening criteria as determined by steps contained in c)(6)a through c)(6)f. below:
 - a. Step 1 - From information regarding the composition and/or ingredients for each cleanup to be used, such as a Material Safety Data Sheet (MSDS), coating specification sheet, etc., identify the following:
 - i. any of the chemical compounds contained in the cleanup material that are listed as a toxic air contaminant in OAC rule 3745-114-01 (if a cleanup material does not contain a toxic air contaminant it will not be necessary to complete the toxics screening criteria);

- ii. if a cleanup material contains a toxic air contaminant as identified in c)(6)a.i, the following information shall be determined on an as applied basis:
 - (a) the density of the cleanup material, in pounds per gallon; and
 - (b) the percent by weight (wt%) of each chemical compound identified in c)(6)a.i. as contained in the cleanup material.
- b. Step 2 - Determine the maximum cleanup material application rate in gallons per hour;
- c. Step 3 - Determine the emission rate (in pounds per hour) for each toxic air contaminant identified in c)(6)a.i. by multiplying the maximum cleanup material application rate in gallons per hour in c)(6)b., the cleanup material density, in pounds per gallon identified in c)(6)a.ii.(a) and wt% for each chemical compound identified in c)(6)a.ii.(b) $\{[c)(6)b.] \times [c)(6)a.ii.(a)] \times [c)(6)a.ii.(b)]\}$;
- d. Step 4 - Determine if any of the toxic air contaminants in the cleanup material are listed in the table below. If any of the toxic air contaminants are listed in the table, calculate the maximum annual emission of that chemical compound, in pounds per year, by multiplying the hourly emission rate in Step 3 above by a maximum operating schedule of 8,760 hours per year;

Chemical Compound	CAS	Molecular Weight (MW)	Allowed Emission Rate (lb/year)
arsenic compounds, as As	7440-38-2	74.92	1.70
benzene	71-43-2	78.11	1100
benzidine	92-87-5	184.23	5.60
benzo(a)pyrene	50-32-8	252.30	6.90
beryllium (and Be compounds)	7440-41-7	9.01	0.350
Cadmium	7440-43-9	112.4	5.20
Chromium	7440-47-3	varies	0.690
Hexachlorobenzene (HCB)	118-74-1	289.78	35.0
mercury (and Hg compounds)	7439-97-6	200.59	0.1
nickel (Ni subsulfide)	12035-72-2	240.19	17.0
Polychlorinated dibenzo-p-dioxins	1746-01-6	varies	0.030
Polychlorinated dibenzofurans	132-64-9	varies	0.030
polychlorinated biphenyls (PCBs, aroclors)	1336-36-3	varies	87.0
vinyl chloride	75-01-4	62.50	2000

Determine if the calculated emission rate is below the allowable emission rate contained in the table above. If all of the toxic air contaminants emitted have a maximum annual emission less than the allowed rate, then move on to Step 5. If

any of the air toxic contaminants are emitted at a rate higher than the allowed emission rate, contact your appropriate District Office or local air agency contact to determine if use of the coating would be permissible.

The procedures in Step 5 and Step 6 that follow do not apply to the air toxic contaminants identified in the table above.

- e. Step 5 – Find the Threshold Limit Value (TLV), in $\mu\text{g}/\text{m}^3$, as listed by the American Conference of Governmental Industrial Hygienists (ACGIH) for all air toxic contaminants identified in c)(6)a.i of Step 1. If the TLV is listed as parts per million (ppm), convert to $\mu\text{g}/\text{m}^3$ by using the following formula:

$$(\text{TLV in ppm}) \times (\text{molecular weight}) \times (1000)/24.45 = \text{TLV in } \mu\text{g}/\text{m}^3$$

- f. Step 6 – Compare the pound per hour emission rate for an air toxic contaminant as determined in c)(6)c. of Step 3 with the allowable emission rates for TLV ranges presented in the table below:

TLV Range ($\mu\text{g}/\text{m}^3$) (The TLV must be less than the high value listed and greater than or equal to the low value listed)		Allowed Emission Rate (lb/hr)
15	1	0.000067
30	15	0.0010
60	30	0.0020
120	60	0.0040
240	120	0.0080
480	240	0.0160
960	480	0.0320
1,920	960	0.0640
3,840	1,920	0.128
7,680	3,840	0.256
15,360	7,680	0.512
30,720	15,360	1.02
61,440	30,720	2.05
122,880	61,440	4.10
245,760	122,880	8.19
491,520	245,760	16.4
983,040	491,520	32.8
1,966,080	983,040	65.5
3,932,160	1,966,080	131

If all air toxic compounds contained in a cleanup material are emitted at a rate less than the allowed emission rate, then the cleanup material passes the toxic screening test and can be used under this permit. If one or more of the air toxic

contaminants are emitted at a rate greater than the allowed emission rate, contact the appropriate District Office or local air agency to discuss other procedures for evaluating emissions of air toxic contaminants before use.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each month for all cleanup materials employed across the entire facility:
 - a. the name and identification number of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the VOC content of each cleanup material, in pounds per gallon;
 - d. the VOC emission rate for each cleanup material employed [d)(1)b. x d)(1)c.], in pounds;
 - e. the total VOC emission rate for all cleanup materials employed [summation of d)(1)d. for all cleanup material], in pounds;
 - f. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of VOC emissions and the average calculated over each rolling 12-month period.
- (2) The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions unit K001, K002, K003, K004, and P801 combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the VOC content of each coating and cleanup material, as applied, in pounds per gallon;
 - d. the VOC emission rate for each coating and cleanup material employed [d)(1)b. x d)(1)c.], in pounds;
 - e. the total VOC emission rate for all the coatings and cleanup material employed [summation of d)(1)d. for all coatings and cleanup material], in pounds;
 - f. during the first 12 calendar months of operation following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons; and
 - g. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month VOC emissions, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions units.

- (3) The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K001, K002, K003, K004, and P801 combined:
- a. the company identification of each coating and cleanup material employed;
 - b. the pounds per gallon of each HAP in each coating and cleanup material, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the emission rate for each HAP from each coating and cleanup material employed [d)(3)b. x d)(3)c. in pounds per month];
 - e. the total emission rate for each HAP from all coatings and cleanup materials employed [summation of d)(3)d.] in pounds per month;
 - f. the total HAP emissions rate for all combined HAPs from all coatings and cleanup materials employed [summation of d)(3)e.] in pounds per month; and
 - g. the rolling, 12-month summations for each individual HAP and all combined HAPs emissions, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions units.

- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter(s), along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (5) The permittee shall conduct periodic inspections of the dry particulate filter(s) to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (6) 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(s) 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.
- (7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system(s) and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;

- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

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

- (8) The permittee shall maintain records that document any time periods when the dry particulate filter(s) was/were not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter(s) was/were 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.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing a daily volume-weighted average 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.
- (4) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. 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 event occurs.
- (5) 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. the first 12 months of operation following the issuance of this permit, all exceedances of the maximum cumulative quantity of material usage for



emission units K001, K002, K003, K004, and P801 combined as specified in section c)(2);

- ii. all exceedances of the 90 tons VOC per rolling, 12-month period for emission units K001, K002, K003, K004, and P801 combined;
 - iii. all exceedances of the 9.0 tons per rolling 12-month period for any single HAP for emission units K001, K002, K003, K004, and P801 combined;
 - iv. all exceedances of the 24.0 tons per rolling, 12-month period for total combined HAPs for emission units K001, K002, K003, K004, and P801 combined;
- 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.

- (6) 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 (the appropriate District Office or local air agency).

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: 1.5 tons VOC per month, averaged over a twelve-month rolling period

Applicable Compliance Method: Compliance with the VOC emission limitation above shall be demonstrated based on the monitoring and recordkeeping established in section d)(1) of this permit.
 - b. Emission Limitation: 90 tons VOC per rolling 12-month period for emission units K001, K002, K003, K004, and P801 combined

Applicable Compliance Method: Compliance with the VOC emission limitation above shall be demonstrated based on the monitoring and recordkeeping established in section d)(2) of this permit.
 - c. Emission Limitation: 9.0 tons per rolling 12-month period for any single HAP for emission units K001, K002, K003, K004, and P801 combined



Final Permit-to-Install and Operate
Colonial Surface Solutions, Inc.
Permit Number: P0115418
Facility ID: 0302000208
Effective Date: 8/19/2015

Applicable Compliance Method: Compliance with the VOC emission limitation above shall be demonstrated based on the monitoring and recordkeeping established in section d)(3) of this permit.

- d. Emission Limitation: 24.0 tons per rolling 12-month period for total combined HAPs for emission units K001, K002, K003, K004, and P801 combined

Applicable Compliance Method: Compliance with the VOC emission limitation above shall be demonstrated based on the monitoring and recordkeeping established in section d)(3) of this permit.

g) Miscellaneous Requirements

- (1) None.