



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

11/4/2015

GIULIO GABRIELE
 MEGGITT AIRCRAFT BRAKING SYSTEMS CORP.
 1204 MASSILLON RD.
 AKRON, OH 44306-4186

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

Facility ID: 1677010999
 Permit Number: P0117992
 Permit Type: Renewal
 County: Summit

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Akron Beacon Journal. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
 Permit Review/Development Section
 Ohio EPA, DAPC
 50 West Town Street Suite 700
 PO Box 1049
 Columbus, Ohio 43216-1049

and Akron Regional Air Quality Management District
 1867 West Market St.
 Akron, OH 44313

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
 ARAQMD; Pennsylvania; West Virginia; Canada



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: Meggitt Aircraft Braking Systems Corp. ("Meggitt") consists of two carbon disk machining units (P904 and P906), one carbonization furnace (P039), seven carbon processing furnaces (P036, P037, P038, P041, P044, P048 and P049), seven paint spray booths (K002, K003, K006, K007, K008, K009 and K010), one oil dip tank (K004) and several permit exempt emissions units.

3. Facility Emissions and Attainment Status: Meggitt emits particulate emissions (PE), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC) and hazardous air pollutants (HAPs) from the above-mentioned emissions units. Meggitt has the potential to emit for VOC, individual HAP and combined HAPs over the Title V thresholds from the above-mentioned emissions units. Summit County is nonattainment for ozone.

4. Source Emissions: Meggitt has request to limit the emissions of VOC, individual HAP and combined HAPs to below the Title V thresholds. After obtaining this federally enforceable Permit to Install and Operate (FEPTIO), the facility-wide individual HAP, combined HAPs and VOC emissions will be under the Title V thresholds and the major source thresholds for the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Aerospace Manufacturing and Rework Facilities, 40 CFR Part 63, Subpart GG. Emissions of VOC, individual HAP and combined HAPs have been limited through restrictions on the coating's VOC and HAP content and through coating usage limitations along with the appropriate monitoring, record keeping and reporting requirements for emissions units K002, K003, K004, K006, K007, K008, K009 and K010 and through control efficiency limitations on the thermal oxidizers used to control emissions from P036, P037, P038, P039, P041, P044, P048 and P049 along with the appropriate monitoring, record keeping and reporting requirements.

5. Conclusion: By establishing federally enforceable operational restrictions, control efficiency limitations and monitoring, record keeping and reporting requirements, Meggitt will avoid being considered a major source for 40 CFR Part 63, Subpart GG and for Title V permitting.

6. Please provide additional notes or comments as necessary:

None

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	36.57
Combined HAPs	21.31
Individual HAP	8.79

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install and Operate Renewal
MEGGITT AIRCRAFT BRAKING SYSTEMS CORP.

1204 MASSILLON RD.,, Akron, OH 44306

ID#:P0117992

Date of Action: 11/4/2015

Permit Desc: Federally Enforceable Permit to Install and Operate renewal permit for two carbon disk machining units (P904 and P906), one carbonization furnace (P039), seven carbon processing furnaces (P036, P037, P038, P041, P044, P048 and P049), seven paint spray booths (K002, K003, K006, K007, K008, K009 and K010) and one oil dip tank (K004)..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Laura Miracle, Akron Regional Air Quality Management District, 1867 West Market St., Akron, OH 44313. Ph: (330)375-2480



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
MEGGITT AIRCRAFT BRAKING SYSTEMS CORP.**

Facility ID:	1677010999
Permit Number:	P0117992
Permit Type:	Renewal
Issued:	11/4/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
MEGGITT AIRCRAFT BRAKING SYSTEMS CORP.

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Draft Permit-to-Install and Operate
MEGGITT AIRCRAFT BRAKING SYSTEMS CORP.
Permit Number: P0117992
Facility ID: 1677010999
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1677010999
Application Number(s): A0051744
Permit Number: P0117992
Permit Description: Federally Enforceable Permit to Install and Operate renewal permit for two carbon disk machining units (P904 and P906), one carbonization furnace (P039), seven carbon processing furnaces (P036, P037, P038, P041, P044, P048 and P049), seven paint spray booths (K002, K003, K006, K007, K008, K009 and K010) and one oil dip tank (K004).
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/4/2015
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

MEGGITT AIRCRAFT BRAKING SYSTEMS CORP.
1204 MASSILLON RD.
Akron, OH 44306

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:

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Authorization (continued)

Permit Number: P0117992

Permit Description: Federally Enforceable Permit to Install and Operate renewal permit for two carbon disk machining units (P904 and P906), one carbonization furnace (P039), seven carbon processing furnaces (P036, P037, P038, P041, P044, P048 and P049), seven paint spray booths (K002, K003, K006, K007, K008, K009 and K010) and one oil dip tank (K004).

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

Emissions Unit ID:	K004
Company Equipment ID:	Oil Dip Tank #634
Superseded Permit Number:	P0102955
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	P039
Company Equipment ID:	Accutherm Carbonization Furnace
Superseded Permit Number:	P0102955
General Permit Category and Type:	Not Applicable

Group Name: Carbon Disk Machining Units

Emissions Unit ID:	P904
Company Equipment ID:	Plant F Baghouse #4
Superseded Permit Number:	P0108639
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P906
Company Equipment ID:	Plant F Baghouse #6
Superseded Permit Number:	P0108639
General Permit Category and Type:	Not Applicable

Group Name: Carbon Processing Furnaces

Emissions Unit ID:	P036
Company Equipment ID:	Carbon Processing Furnace P036-A
Superseded Permit Number:	P0102955
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P037
Company Equipment ID:	Carbon Processing Furnace P037-A
Superseded Permit Number:	P0102955
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P038
Company Equipment ID:	Carbon Processing Furnace
Superseded Permit Number:	P0102955
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P041
Company Equipment ID:	Carbon Processing Furnace
Superseded Permit Number:	P0102955
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P044
Company Equipment ID:	Carbon Processing Furnace
Superseded Permit Number:	P0111997



General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P048
Company Equipment ID:	Carbon Processing Furnace P036-B
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P049
Company Equipment ID:	Carbon Processing Furnace P037-B
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Paint Spray Booths

Emissions Unit ID:	K002
Company Equipment ID:	Binks Touch-up Booth
Superseded Permit Number:	P0102955
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Main Paint Shop
Superseded Permit Number:	P0102955
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K006
Company Equipment ID:	Devilbiss Spray Paint Booth w/ Despatch Oven
Superseded Permit Number:	P0102955
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K007
Company Equipment ID:	Paint Booth
Superseded Permit Number:	P0102955
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K008
Company Equipment ID:	Binks Touch-up Booth
Superseded Permit Number:	P0102955
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K009
Company Equipment ID:	Main Paint Shop
Superseded Permit Number:	P0102955
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K010
Company Equipment ID:	Main Paint Shop
Superseded Permit Number:	P0102955
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
MEGGITT AIRCRAFT BRAKING SYSTEMS CORP.
Permit Number: P0117992
Facility ID: 1677010999
Effective Date: To be entered upon final issuance

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 Akron Regional Air Quality Management District 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.



Draft Permit-to-Install and Operate
MEGGITT AIRCRAFT BRAKING SYSTEMS CORP.
Permit Number: P0117992
Facility ID: 1677010999
Effective Date: To be entered upon final issuance

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.
 - (2) None.



Draft Permit-to-Install and Operate
MEGGITT AIRCRAFT BRAKING SYSTEMS CORP.
Permit Number: P0117992
Facility ID: 1677010999
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. K004, Oil Dip Tank #634

Operations, Property and/or Equipment Description:

One oil dipping tank (Plant B - Dept 656) - Oil Dip Tank #634

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)d., c)(1), c)(2), c)(3), d)(2), e)(3) and f)(1)b.
- 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 3745-21-09(U)(2)(e)(ii)	The permittee shall not employ more than three gallons of coating per day for the miscellaneous metal parts and products coating line. See b)(2)b. below.
b.	OAC rule 3745-21-09(U)	For any source located in Ashtabula, Cuyahoga, Geauga, Lake, Lorain, Medina, Portage, or Summit county subject to paragraph (U) of OAC rule 3745-21-09, the requirement to comply with paragraph (U) of OAC rule 3745-21-09 shall terminate at such time the source becomes subject to and complies with rule 3745-21-26 of the Administrative Code. See b)(2)b. below.
c.	OAC rule 3745-21-26	Metal parts coating operations are



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>exempt from paragraph (C) of OAC rule 3745-21-26 where the following occurs: The coating line never uses more than three gallons per day. The daily usage applicability level shall not apply to coatings employed by the coating line on parts or products which are not metal.</p> <p>See c)(4) and c)(5) below.</p> <p>The compliance date for the coating line is October 15, 2016.</p> <p>See b)(2)b. below.</p>
d.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V permitting and MACT applicability under 40 CFR Part 63, Subpart GG)	<p>The emissions of VOC from this emissions unit shall not exceed 2.5 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>See c)(1), c)(2), and c)(3) below.</p>
e.	OAC rule 3745-17-11(A)(1)(h)	<p>Surface coating processes that apply only dip coatings are exempt from OAC rule 3745-17-11.</p>
f.	OAC rule 3745-21-19(A)(2)	<p>The facility is excluded from the requirements of this rule because the facility has requested to limit the potential to emit for volatile organic compounds (VOC) to less than 25.0 tons per year for all operations combined where aerospace components and vehicles are cleaned or coated (i.e., emissions units K002, K003, K004, K006, K007, K008, K009 and K010, combined).</p>

(2) Additional Terms and Conditions

- a. There are no cleanup materials employed in this emissions unit.
- b. On October 15, 2015, OAC rule 3745-21-26 which establishes emission limitations for VOC emissions for the surface coating of miscellaneous metal and plastic parts was added to OAC 3745-21. These VOC emissions limitations and associated operational restrictions, monitoring, record keeping and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves OAC rule 3745-21-26 as an addition to the Ohio State Implementation Plan (SIP).



The following terms shall become federally enforceable after U.S. EPA approves the rule revision: b)(1)c., c)(4), c)(5) and e)(4)

The following term and condition shall become void after U.S. EPA approves the rule revision: b)(1)a.

c) Operational Restrictions

- (1) The maximum annual coating usage for this emissions unit shall not exceed 819 gallons based upon a rolling, 12-month summation of the coating usage figures.
- (2) The VOC content of each coating employ in this emissions unit shall not exceed 6.1 pounds of VOC per gallon of coating, as applied.
- (3) The permittee shall not employ any coatings that contain any of the HAPs listed in section 112(b) of the Clean Air Act in this emissions unit
- (4) One, or a combination, of the following application methods shall be used for coating application:
 - a. Electrostatic equipment.
 - b. High volume low pressure (HVLP) spray equipment.
 - c. Flow coating.
 - d. Roller coating.
 - e. Dip coating, including electrodeposition.
 - f. Airless spray.
 - g. Air-assisted airless spray.
 - h. Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying.
- (5) Work practices shall be used to minimize VOC emissions from mixing operations, storage tanks and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but are not limited to, the following:
 - i. Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
 - j. Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
 - k. Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

- (2) The permittee shall submit deviation (excursion) reports that identify any day during which any coating that contained any of the HAPs listed in section 112(b) of the Clean Air Act was employed in this emissions unit. These deviation reports shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after any such coating was employed.
- (3) 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 rolling, 12-month coating usage limitation;
 - ii. all exceedances of the rolling, 12-month VOC limitation;
 - iii. all exceedances of the VOC content limitation;
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted 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).

- (4) The owner or operator of a coating line that is subject to this rule with an initial startup date before the effective date of this rule shall notify the Ohio EPA district office or local air agency in writing that the coating line is subject to this rule. The notification, which shall be submitted not later than sixty days after the effective date of OAC rule 3745-21-26 (i.e., December 14, 2015), shall provide the following information:
- e. Name and address of the owner or operator.
 - f. Address (i.e., physical location) of the facility.
 - g. Equipment description and Ohio EPA application number (if assigned) of the subject coating line.
 - h. Identification of the VOC emission requirement, the means of compliance, and the compliance date for the subject coating line.



- (5) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (6) All applications, notifications or reports required by terms and conditions in this permit to be submitted or “reported in writing” are to be submitted to Ohio EPA through the Ohio EPA’s eBusiness Center: Air Services web service (“Air Services”). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be “submitted” on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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:

The permittee shall not employ more than three gallons of coating per day for the miscellaneous metal parts and products coating line.

Applicable Compliance Method:

Compliance with the coating usage limitation above shall be demonstrated based on the record keeping requirements in d)(1) above.
 - b. Emission Limitation:

The emissions of VOC from this emissions unit shall not exceed 2.5 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation above shall be demonstrated based on the record keeping requirements in d)(2) above.

g) Miscellaneous Requirements

- (1) None.



2. P039, Accutherm Carbonization Furnace

Operations, Property and/or Equipment Description:

Carbonization furnace (Plant F-Dept. 665) - Accutherm Carbonization Furnace

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)b., b)(2)a., d)(1), d)(2), e)(1), f)(1), f)(2)c. and f)(2)d .
- 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	<p>The emissions of organic material (OM) from this emissions unit shall not exceed 2.5 pounds per hour and 10.95 tons per year.</p> <p>All OM emissions from this emissions unit shall be vented to a thermal oxidizer with at least 99 percent, destruction efficiency, by weight.</p>
b.	<p>OAC rule 3745-31-05(D)</p> <p>(Synthetic Minor to avoid Title V permitting and MACT applicability under 40 CFR Part 63, Subpart GG)</p>	<p>The control efficiency for the thermal oxidizers shall not be less than 99 percent, by weight, for VOC and organic hazardous air pollutants (HAPs).</p> <p>The control efficiency limitation above restricts the annual emissions of VOC and combined HAPs from this emissions unit to 0.36 ton per year and 0.31 ton per year, respectively.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>The annual emission limitations are based on the “worst-case” scenario. However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a final Chapter 31 or a final administrative modification to the federally enforceable permit-to-install and operate (FEPTIO) prior to the change(s).</p>
c.	OAC Rule 3745-21-07(N)(3)	<p>“Aircraft Braking Systems Corp.” (facility ID 1677010999) or any subsequent owner or operator of the “Aircraft Braking Systems Corp.” facility located at “1204 Massillon Road, Akron, Ohio” shall not emit a waste gas stream into the atmosphere from emissions unit P039 unless such waste gas stream is properly burned at 1300 degrees Fahrenheit for 0.3 seconds or greater in a direct-flame afterburner or equally effective control device for OC emissions.</p>

(2) Additional Terms and Conditions

- a. All of the OM, VOC and organic HAP emissions from this emissions unit shall be vented to the thermal oxidizer that shall meet the operational, monitoring and record keeping requirements of this permit, when the emissions unit is in operation.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable temperature of the exhaust gases from the thermal oxidizer during any period of time when the emissions unit controlled by the thermal oxidizer is in operation, shall not be less than 1050 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance.

- (2) The permittee shall properly install, operate and maintain a continuous temperature monitor and recorder that measures and records the temperature of the exhaust gases from the thermal oxidizer when the emissions unit is in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit is in operation:
- a. all 3-hour blocks of time, when the emissions unit controlled by the thermal oxidizer was in operation, during which the average temperature of the exhaust gases from the thermal oxidizer was less than 1050 degrees Fahrenheit or was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance; and
 - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit was in operation.
- (3) Whenever the monitored average temperature of the exhaust gases from the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;
 - c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and
 - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;



- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

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

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. each period of time (start time and date, and end time and date) when the average temperature of the exhaust gases from the thermal oxidizer was less than 1050 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit was in compliance;
 - ii. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit was in operation;
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted 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).

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual PER the following information concerning the operations of the thermal oxidizer during the 12-month reporting period for this emissions unit:
 - e. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;
 - f. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the thermal oxidizer;
 - g. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;
 - h. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the emissions unit into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - i. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) All applications, notifications or reports required by terms and conditions in this permit to be submitted or “reported in writing” are to be submitted to Ohio EPA through the Ohio EPA’s eBusiness Center: Air Services web service (“Air Services”). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be “submitted” on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to the permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the destruction efficiency limitation for OM, VOC and organic HAPs.
 - c. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
 - d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
 - f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the



submission of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(2) 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:

The emissions of OM from this emissions unit shall not exceed 2.5 pounds per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable OM emission limitation above based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

The emissions of OM from this emissions unit shall not exceed 10.95 tons per year.

Applicable Compliance Method:

Compliance with the annual allowable OM emissions limitation above shall be demonstrated by multiplying the hourly allowable OM emission limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be demonstrated.

c. Emission Limitations:

All OM emissions from this emissions unit shall be vented to a thermal oxidizer with at least 99 percent, destruction efficiency, by weight.

The control efficiency for the thermal oxidizers shall not be less than 99 percent, by weight, for VOC and organic HAPs.

Applicable Compliance Method:

Compliance with the allowable OM, VOC and organic HAPs control (destruction) efficiency above shall be based on the results of emission testing conducted in accordance with the procedures and test methods as outlined in f)(1) above.

d. Emission Limitations:

The control efficiency limitation above restricts the annual emissions of VOC and combined HAPs from this emissions unit to 0.36 ton per year and 0.31 ton per year, respectively.



Draft Permit-to-Install and Operate
MEGGITT AIRCRAFT BRAKING SYSTEMS CORP.
Permit Number: P0117992
Facility ID: 1677010999
Effective Date: To be entered upon final issuance

Applicable Compliance Method:

Compliance with the allowable annual VOC and combined HAPs emission limitations above shall be demonstrated by multiplying the “worst-case” hourly emissions that are vented to the thermal oxidizer by (1-0.99) times 8760 hours per year, and then dividing by 2000 pounds per ton.

- g) Miscellaneous Requirements
 - (1) None.



3. Emissions Unit Group -Carbon Disk Machining Units: P904,P906,

EU ID	Operations, Property and/or Equipment Description
P904	Machining cell for removing carbon from brake disks. It is attached to a dust collector with a fabric filter (99% removal efficiency) and exhausts inside the building (5,400 acfm).
P906	Machining cell for removing carbon from brake disks. It is attached to a dust collector with a fabric filter (99% removal efficiency) and exhausts inside the building (5,400 acfm).

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	For emissions units P904 and P906, the particulate emissions (PE) from each emissions unit shall not exceed 1.39 pounds per hour and 6.09 tons per year. See b)(2)a. and c)(1) below.
b.	OAC rule 3745-17-07(B)(1)	Visible PE from any fugitive dust source shall not exceed twenty percent opacity, as a three-minute average.
c.	OAC rule 3745-17-08	The permittee shall use hoods, fans and other equipment to adequately enclose, contain, capture, vent and control the fugitive dust. The collection efficiency shall be sufficient to minimize or eliminate



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		visible PE of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
d.	OAC rule 3745-17-11(B)(1)	See b)(2)b below.

(2) Additional Terms and Conditions

- a. The best available technology (BAT) requirements include compliance with OAC rule 3745-17-08. The hourly and annual PE limitations are greater than the controlled potential to emit for the emissions units listed above. Therefore, monitoring and recordkeeping requirements are not necessary to ensure compliance with these emission limitations.
- b. Pursuant to OAC rule 3745-17-11(A)(1)(f), this rule is not applicable to the generation of fugitive dust which is subject to OAC rule 3745-17-08.

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit(s) is/are in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving the emissions units listed above. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. Emissions unit identification for the emissions unit(s) that is/are operating;
 - b. the location and color of the emissions;
 - c. whether the emissions are representative of normal operations;
 - d. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - e. the total duration of any visible emissions incident; and
 - f. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions

incident under item (e) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (2) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (3) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving the emissions units listed above; and
 - b. any corrective actions taken to minimize or eliminate the visible emissions.
- (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is



considered to be “submitted” on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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 Limitations:

For emissions units P904 and P906, the PE from each emissions unit shall not exceed 1.39 pounds per hour and 6.09 tons per year.

Applicable Compliance Methods:

If required, the permittee shall demonstrate compliance with the hourly PE limitation above based on the results of emission testing conducted in accordance with Methods 1-5, as appropriate, of 40 CFR Part 60, Appendix A.

The annual allowable PE limitation above was determined by multiplying the hourly allowable PE limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation will be demonstrated.

b. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

(1) None.



4. Emissions Unit Group - Carbon Processing Furnaces: P036, P037, P038, P041, P044, P048, P049,

EU ID	Operations, Property and/or Equipment Description
P036	11' carbon processing furnace - Carbon Processing Furnace P036-A
P037	11' carbon processing furnace - Carbon Processing Furnace P037-A
P038	11' carbon processing furnace
P041	One 11' Carbon Processing Furnace - Carbon Processing Furnace
P044	Carbon Processing Furnace (Plant F-Dept. 665) - Carbon Processing Furnace
P048	One 11' carbon processing furnace - Carbon Processing Furnace P036-B (Previously part of emissions unit P036 covered by Permit to Install 16-1531)
P049	One 11' carbon processing furnace - Carbon Processing Furnace P037-B (Previously part of emissions unit P037 covered by Permit to Install 16-1531)

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

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

a. None.

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

a. b)(1)b., b)(2)a., d)(1), d)(2), e)(1), f)(1), f)(1)c. and f)(1)d.

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)	<p>The emissions of organic material (OM) from emissions units P036 and P048, combined, shall not exceed 2.5 pounds per hour and 10.95 tons per year.</p> <p>The emissions of OM from emissions units P037 and P049, combined, shall not exceed 2.5 pounds per hour and 10.95 tons per year.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>The emissions of OM from emissions unit P038 shall not exceed 2.5 pounds per hour and 10.95 tons per year.</p> <p>The emissions of OM from emissions unit P041 shall not exceed 2.5 pounds per hour and 10.95 tons per year.</p> <p>All OM emissions from emissions units P036, P037, P038, P041, P048 and P049 shall be vented to a thermal oxidizer with at least 99 percent, destruction efficiency, by weight.</p> <p>The volatile organic compound (VOC) emissions from emissions unit P044 shall not exceed 2.47 pounds per hour and 10.82 tons per year.</p> <p>All emissions from emissions unit P044 shall be vented to a thermal incinerator control device whenever the emissions unit is in operation. The thermal incinerator shall have a minimum control efficiency of 99%, by weight, for VOC, and shall meet the operational, monitoring, and record keeping requirements of this permit.</p>
b.	<p>OAC rule 3745-31-05(D)</p> <p>(Synthetic Minor to avoid Title V permitting and MACT applicability under 40 CFR Part 63, Subpart GG)</p>	<p>The control efficiency for the thermal oxidizers shall not be less than 99 percent, by weight, for VOC and organic hazardous air pollutants (HAPs).</p> <p>The control efficiency limitation above restricts the annual emissions of VOC and combined HAPs from emissions units P036, P037, P038, P041, P044, P048 and P049, combined, to 11.31 tons per year and 0.8 ton per year, respectively.</p> <p>The annual emission limitations are based on the "worst-case" scenario. However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a final Chapter 31 or a final administrative modification to the federally enforceable permit-to-install and operate (FEPTIO) prior to the change(s).
c.	OAC Rule 3745-21-07(N)(3)	The control measure specified by this rule is less stringent than the control measure established pursuant to OAC rule 3745-31-05(D) as specified under d)(1) and d)(2) below.

(2) Additional Terms and Conditions

- a. All of the VOC and organic HAPs emissions from the emissions units listed above and all of the OM emissions from emissions units P036, P037, P038, P041, P048 and P049 shall be vented to a thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when one or more of the emissions units are in operation.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the north thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the north thermal oxidizer is/are in operation, shall not be less than 1747 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the south thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the south thermal oxidizer is/are in operation, shall not be less than 1750 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.
- (3) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizers when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each

thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

- a. all 3-hour blocks of time, when the emissions unit(s) was/were in operation and was/were venting to the north thermal oxidizer, during which the average combustion temperature within the north thermal oxidizer was less than 1747 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
- b. all 3-hour blocks of time, when the emissions unit(s) was/were in operation and was/were venting to the south thermal oxidizer, during which the average combustion temperature within the south thermal oxidizer was less than 1750 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
- c. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

- (4) Whenever the monitored average combustion temperature within either of the thermal oxidizers deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;
 - c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and
 - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature ranges/limits are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature ranges/limits based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature ranges/limits will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

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

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all 3-hour blocks of time (when the emissions unit(s) was/were in operation and was/were venting to the north thermal oxidizer) during which the average combustion temperature within the thermal oxidizer was less than 1747 degrees Fahrenheit or was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
 - ii. all 3-hour blocks of time (when the emissions unit(s) was/were in operation and was/were venting to the south thermal oxidizer) during which the average combustion temperature within the thermal oxidizer was less than 1750 degrees Fahrenheit or was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;



- iii. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation;
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted 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).

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual PER the following information concerning the operations of the thermal oxidizers during the 12-month reporting period for the emissions units listed above:
 - e. each period of time (start time and date, and end time and date) when the average combustion temperature within either the north or the south thermal oxidizer was outside of the acceptable range;
 - f. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to either the south or the north thermal oxidizer;
 - g. each incident of deviation described in "a" or "b" (above) where a prompt investigation was not conducted;
 - h. each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - i. each incident of deviation described in "a" or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

- (4) All applications, notifications or reports required by terms and conditions in this permit to be submitted or “reported in writing” are to be submitted to Ohio EPA through the Ohio EPA’s eBusiness Center: Air Services web service (“Air Services”). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be “submitted” on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- f) **Testing Requirements**
- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months prior to the permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the destruction efficiency limitation for VOC, organic HAPs and OM.
 - c. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
 - d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility’s ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an “Intent to Test” notification to the appropriate Ohio EPA District Office or local air agency. The “Intent to Test” notification shall describe in detail the proposed test methods and procedures, the emissions unit operating



parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
- (2) 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 Limitations:
 - The emissions of OM from emissions units P036 and P048, combined, shall not exceed 2.5 pounds per hour.
 - The emissions of OM from emissions units P037 and P049, combined, shall not exceed 2.5 pounds per hour.
 - The emissions of OM from emissions unit P038 shall not exceed 2.5 pounds per hour.
 - The emissions of OM from emissions unit P041 shall not exceed 2.5 pounds per hour.
 - The VOC emissions from emissions unit P044 shall not exceed 2.47 pounds per hour.
 - Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable OM and VOC emission limitations above based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.
 - b. Emission Limitation:
 - The emissions of OM from emissions units P036 and P048, combined, shall not exceed 10.95 tons per year.



The emissions of OM from emissions units P037 and P049, combined, shall not exceed 10.95 tons per year.

The emissions of OM from emissions unit P038 shall not exceed 10.95 tons per year.

The emissions of OM from emissions unit P041 shall not exceed 10.95 tons per year.

The VOC emissions from emissions unit P044 shall not exceed 10.82 tons per year.

Applicable Compliance Method:

The annual allowable OM and VOC emission limitations above were determined by multiplying the hourly allowable OM/VOC emission limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitations are maintained, compliance with the annual allowable emission limitations will be demonstrated.

c. Emission Limitations:

All OM emissions from emissions units P036, P037, P038, P041, P048 and P049 shall be vented to a thermal oxidizer with at least 99 percent, destruction efficiency, by weight.

All emissions from emissions unit P044 shall be vented to a thermal incinerator control device whenever the emissions unit is in operation. The thermal incinerator shall have a minimum control efficiency of 99%, by weight, for VOC, and shall meet the operational, monitoring, and record keeping requirements of this permit.

The control efficiency for the thermal oxidizers shall not be less than 99 percent, by weight, for VOC and organic HAPs.

Applicable Compliance Methods:

Compliance with the allowable VOC, organic HAPs and OM control (destruction) efficiency above shall be based on the results of emission testing conducted in accordance with the procedures and test methods as outlined in f)(1) above.

d. Emission Limitations:

The control efficiency limitation above restricts the annual emissions of VOC and combined HAPs from emissions units P036, P037, P038, P041, P044, P048 and P049, combined, to 11.31 tons per year and 0.8 ton per year, respectively.

Applicable Compliance Method:

Compliance with the allowable annual VOC and combined HAPs emission limitations above shall be demonstrated by multiplying the “worst-case” hourly



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emissions from emissions units P036, P037, P038, P041, P044, P048 and P049 that are vented to the thermal oxidizer by (1-0.99) times 8760 hours per year, and then dividing by 2000 pounds per ton.

- g) Miscellaneous Requirements
 - (1) None.



5. Emissions Unit Group - Paint Spray Booths: K002, K003, K006, K007, K008, K009, K010,

EU ID	Operations, Property and/or Equipment Description
K002	Final assemble south touch-up spray paint booth (Plant B - Dept 656) - Binks Touch-up Booth
K003	Main paint shop north spray paint booth (Plant B - Dept 656) - Main Paint Shop
K006	Spray paint booth and oven (Plant B - Dept. 626) - Devilbiss Spray Paint Booth w/ Despatch Oven
K007	Paint Booth (Plant A-Dept. 675) - Paint Booth
K008	One paint spray booth. (Plant B - Dept 656) - Binks Touch-up Booth
K009	One paint spray booth. (Plant B - Dept 656) - Main Paint Shop
K010	One paint spray booth. (Plant B - Dept 656) - Main 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. None.

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

a. b)(1)d., c)(1), c)(2), c)(3), c)(4), c)(5), d)(2), d)(3), d)(4), e)(2), e)(3) and f)(1)b.

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 3745-21-09(U)(2)(e)(ii)	For emissions units K002, K003, K008, K009 and K010, the permittee shall not employ more than three gallons of coating per day for the miscellaneous metal parts and products coating line.
b.	OAC rule 3745-21-19(A)(2)	The facility is excluded from the requirements of this rule because the facility has requested to limit the potential to emit for VOC to less than 25.0 tons per year for all operations combined where aerospace components and vehicles are



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		cleaned or coated (i.e., emissions units K002, K003, K004, K006, K007, K008, K009 and K010, combined).
c.	OAC rule 3745-21-26	<p>Metal parts coating operations are exempt from paragraph (C) of OAC rule 3745-21-26 where the following occurs: The coating line never uses more than three gallons per day. The daily usage applicability level shall not apply to coatings employed by the coating line on parts or products which are not metal.</p> <p>See c)(4) and c)(5) below.</p> <p>The compliance date for the coating line is October 15, 2016.</p>
d.	<p>OAC rule 3745-31-05(D)</p> <p>(Synthetic Minor to avoid Title V permitting and MACT applicability under 40 CFR Part 63, Subpart GG)</p>	<p>The emissions of any individual hazardous air pollutant (HAP) from emissions units K002, K003, K006, K007, K008, K009 and K010, combined, shall not exceed 8.79* tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>The emissions of combined hazardous air pollutants (HAPs) from emissions units K002, K003, K006, K007, K008, K009 and K010, combined, shall not exceed 20.2 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>The emissions of VOC from emissions units K002, K003, K006, K007, K008, K009 and K010, combined, shall not exceed 22.4 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>See c)(1), c)(2) and c)(3) below.</p> <p>*The individual HAP emission limitation is low enough that the potential emissions of combined HAPs from emissions units P036, P037, P038, P039, P041, P044, P048 and P049, combined, will not cause the individual HAP emission limitation to</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed 10 tons per year.
e.	OAC rule 3745-17-11(A)(1)(i)	Surface coating processes that use less than five gallons of coatings per day, provided the owner or operator maintains coating usage records, coating purchase records, and/or production records that clearly demonstrate the actual coating usage is less than five gallons per day are exempt from OAC rule 3745-17-11.

(2) Additional Terms and Conditions

- a. On October 15, 2015, OAC rule 3745-21-26 which establishes emission limitations for VOC emissions for the surface coating of miscellaneous metal and plastic parts was added to OAC 3745-21. These VOC emission limitations and associated operational restrictions, monitoring, record keeping and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves OAC rule 3745-21-26 as an addition to the Ohio State Implementation Plan (SIP).

The following terms shall become federally enforceable after U.S. EPA approves the rule revision: b)(1)c., c)(4), c)(5) and e)(4)

The following term and condition shall become void after U.S. EPA approves the rule revision: b)(1)a.

c) Operational Restrictions

- (1) The maximum annual coating usage for emissions units K002, K003, K006, K007, K008, K009 and K010, combined, shall not exceed 5,980 gallons, based upon a rolling, 12-month summation of the coating usage figures.
- (2) The VOC content of each coating employ in the emissions units listed above shall not exceed 7.5 pounds of VOC per gallon of coating, as applied.
- (3) The permittee shall not employ any cleanup materials that contain any of the HAPs listed in section 112(b) of the Clean Air Act and that contain any VOC in the emissions units listed above.
- (4) One, or a combination, of the following application methods shall be used for coating application:
 - a. Electrostatic equipment.
 - b. High volume low pressure (HVLP) spray equipment.
 - c. Flow coating.

- d. Roller coating.
 - e. Dip coating, including electrodeposition.
 - f. Airless spray.
 - g. Air-assisted airless spray.
 - h. Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying.
- (5) Work practices shall be used to minimize VOC emissions from mixing operations, storage tanks and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but are not limited to, the following:
- i. Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
 - j. Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
 - k. Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
 - l. Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one location to another in closed containers or pipes.
 - m. Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each day for each emissions unit listed above:
- a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all of the coatings employed.
- (2) The permittee shall maintain monthly records of the following information for emissions units K002, K003, K006, K007, K008, K009 and K010, combined:
- a. the coating usage for each month; and
 - b. the rolling, 12-month summation of the coating usage.

- (3) The permittee shall collect and record the following information each month for all materials containing any HAP¹ and/or VOC that are applied in the emissions units K002, K003, K006, K007, K008, K009 and K010, combined:
- a. the name and identification number/code of each coating, thinner, additive and any other material containing any VOC and/or any HAP;
 - b. the VOC content of each material applied, in pounds per gallon;
 - c. the name/identification of each individual HAP contained in each material applied (and identified in “a” above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;
 - d. the number of gallons of each coating, thinner, additive and other material applied during the month;
 - e. the VOC emissions from all the materials employed, in ton(s), i.e., the summation of the products of “b” times “d” for all the materials applied during the month, divided by 2,000 pounds per ton;
 - f. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of “c” times “d” for all the materials applied during the month, divided by 2,000 pounds per ton;
 - g. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from “f” above;
 - h. the total VOC emissions during the rolling 12-month period, i.e., the summation of all the VOC emissions, as recorded in “e” above, for the present month plus the previous 11 months of operation, in ton(s);
 - i. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in “f” above, for the present month plus the previous 11 months of operation, in ton(s); and
 - j. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in “g” above, for the present month plus the previous 11 months of operation, in ton(s).

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

- (4) The permittee shall maintain documentation to prove that each cleanup material employed does not contain any HAP and does not contain any VOC.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
- (2) The permittee shall submit deviation (excursion) reports that identify any day during which any cleanup material that contained any of the HAPs listed in section 112(b) of the Clean Air Act and/or any VOC was employed in any of the emissions units listed above. These deviation reports shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after any such cleanup material was employed.
- (3) 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 rolling, 12-month coating usage limitation;
 - ii. all exceedances of the rolling, 12-month emission limitation for individual HAP;
 - iii. all exceedances of the rolling, 12-month emission limitation for combined HAPs;
 - iv. all exceedances of the rolling, 12-month emission limitation for VOC; and
 - v. all exceedances of the VOC content limitation;
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted 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).

- (4) The owner or operator of a coating line that is subject to this rule with an initial startup date before the effective date of this rule shall notify the Ohio EPA district office or local air agency in writing that the coating line is subject to this rule. The notification, which shall be submitted not later than sixty days after the effective date of OAC rule 3745-21-26 (i.e., December 14, 2015), shall provide the following information:
 - e. Name and address of the owner or operator.
 - f. Address (i.e., physical location) of the facility.
 - g. Equipment description and Ohio EPA application number (if assigned) of the subject coating line.
 - h. Identification of the VOC emission requirement, the means of compliance, and the compliance date for the subject coating line.
 - (5) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
 - (6) All applications, notifications or reports required by terms and conditions in this permit to be submitted or “reported in writing” are to be submitted to Ohio EPA through the Ohio EPA’s eBusiness Center: Air Services web service (“Air Services”). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be “submitted” on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- 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 Limitations:

For emissions units K002, K003, K008, K009 and K010, the permittee shall not employ more than three gallons of coating per day for the miscellaneous metal parts and products coating line.



Applicable Compliance Method:

Compliance with the allowable coating usage limitation above shall be demonstrated based on the record keeping requirements established in d)(1) above.

b. Emission Limitations:

The emissions of any individual HAP from emissions units K002, K003, K006, K007, K008, K009 and K010, combined, shall not exceed 8.79 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of combined HAPs from emissions units K002, K003, K006, K007, K008, K009 and K010, combined, shall not exceed 20.2 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of VOC from emissions units K002, K003, K006, K007, K008, K009 and K010, combined, shall not exceed 22.4 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the allowable annual individual HAP, combined HAPs and VOC emission limitations above shall be demonstrated based on the record keeping requirements established in d)(3) above.

g) Miscellaneous Requirements

(1) None.