Ohio Environmental Protection Agency

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

11/16/2015

Certified Mail

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

Ms. Rebecca Baciak
HORTON EMERGENCY VEHICLE CO
3800 McDowell Road
Grove City, OH 43213

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

Facility ID: 0125042195
Permit Number: P0109254
Permit Type: Renewal
County: Franklin

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO)for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Columbus Dispatch. 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

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

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 Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

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

Cc: U.S. EPA Region 5*Via E-Mail Notification*
Ohio EPA-CDO

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
HORTON EMERGENCY VEHICLE CO
3800 MCDOWELL ROAD,, Grove City, OH 43123
ID#:P0109254
Date of Action: 11/16/2015
Permit Desc:FEPTIO renewal permit for five (5) spray booths, one (1) adhesive spray booth, one (1) paint room, several coating/adhesive application and assembly areas and one (1) glue table..
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: Matthew Woods, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
HORTON EMERGENCY VEHICLE CO

Facility ID:	0125042195
Permit Number:	P0109254
Permit Type:	Renewal
Issued:	11/16/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
HORTON EMERGENCY VEHICLE CO

Table of Contents

Authorization 1

A. Standard Terms and Conditions 4

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

B. Facility-Wide Terms and Conditions 9

C. Emissions Unit Terms and Conditions 14

1. K005, Paint Final 15
2. K006, Final Assembly 19
3. K008, Batch Lot 23
4. K009, Contact Cement Booth 27
5. K010, Glue Table 34
6. K011, Fabrication 39
7. K012, Pre-Delivery 43
8. K013, Paint/Prep 47
9. P001, Paint Mix Room 54

10. Emissions Unit Group -Spray booths: K001, K002, K003, K004, K014..... 58

Authorization

Facility ID:	0125042195
Application Number(s):	A0043389, A0045144
Permit Number:	P0109254
Permit Description:	FEPTIO renewal permit for five (5) spray booths, one (1) adhesive spray booth, one (1) paint room, several coating/adhesive application and assembly areas and one (1) glue table.
Permit Type:	Renewal
Permit Fee:	$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	11/16/2015
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:

HORTON EMERGENCY VEHICLE CO
3800 MCDOWELL ROAD
Grove City, OH 43123

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0109254
Permit Description: FEPTIO renewal permit for five (5) spray booths, one (1) adhesive spray booth, one (1) paint room, several coating/adhesive application and assembly areas and one (1) glue table.

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

Emissions Unit ID:	**K005**
Company Equipment ID:	Paint Final
Superseded Permit Number:	01-12128
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K006**
Company Equipment ID:	Final Assembly
Superseded Permit Number:	01-12128
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K008**
Company Equipment ID:	BatchLot
Superseded Permit Number:	01-12128
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K009**
Company Equipment ID:	Contact Cement Booth
Superseded Permit Number:	P0107370
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K010**
Company Equipment ID:	Glue Table
Superseded Permit Number:	01-12128
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K011**
Company Equipment ID:	Fabrication
Superseded Permit Number:	01-12128
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K012**
Company Equipment ID:	Pre-Delivery
Superseded Permit Number:	01-12128
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K013**
Company Equipment ID:	Paint/Prep
Superseded Permit Number:	01-12128
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P001**
Company Equipment ID:	Paint Mix Room
Superseded Permit Number:	01-12128
General Permit Category and Type:	Not Applicable

Group Name: Spray booths

Emissions Unit ID:	**K001**
Company Equipment ID:	Paint Booth 1
Superseded Permit Number:	01-12128
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Paint Booth 2
Superseded Permit Number:	01-12128
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K003**
Company Equipment ID:	Paint Booth 3
Superseded Permit Number:	01-12128
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K004**
Company Equipment ID:	Paint Booth 4
Superseded Permit Number:	01-12128
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K014**
Company Equipment ID:	Paint Booth 5
Superseded Permit Number:	01-12128
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Central District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

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

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

Again, you cannot resume operation of any emissions unit certified by the authorized official as beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

a) Applicable Emissions Limitations and/or Control Requirements

(1) This permit establishes the following federally enforceable limitations on emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, for the purpose of avoiding Maximum Achievable Control Technology (MACT) regulations and Title V permitting requirements:

a. The actual emissions from emissions units K001, K002, K003, K004, K005, K006, K008, K009, K010, K011, K012, K013, K014, P001 and all other emission sources at the facility, including but not limited to any de minimis emissions units as defined in OAC rule 3745-15-05, or any registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 9.9 tons for any single HAP (IHAP), based upon a rolling, 12-month summation.

b. The actual emissions from emissions units K001, K002, K003, K004, K005, K006, K008, K009, K010, K011, K012, K013, K014, P001 and all other emission sources at the facility, including but not limited to any de minimis emissions units as defined in AOC rule 3745-15-05, or any registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 24.9 tons for any combination of HAPs (TCHAP), based upon a rolling, 12-month summation.

b) Monitoring and Record Keeping:

(1) The permittee shall collect and record the following information each month for the purpose of calculating the rolling, 12-month summation of HAP emissions:

a. the name and identification of each material (coating, adhesive, solvent, thinner, cleaner, clean up) employed;

b. the individual HAP (IHAP) content for each HAP for each material, in pounds per gallon of material, as applied;

c. the combined HAP (TCHAP) content, in pounds per gallon of material, as applied;

d. the number of gallons of each material employed;

e. the total uncontrolled emissions of each individual HAP from any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, in tons, calculated in accordance with B.1.d)(1) ;

f. the total uncontrolled emissions of combined HAPs from any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status

and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, in tons, calculated in accordance with B.1.d)(1) ;

g. the total uncontrolled emissions of each individual HAP from emissions units K001, K002, K003, K004, K005, K006, K008, K009, K010, K011, K012, K013, K014 and P001, in tons, calculated in accordance with B.1.d)(1) ;

h. the total uncontrolled emissions of combined HAPs from emissions units K001, K002, K003, K004, K005, K006, K008, K009, K010, K011, K012, K013, K014 and P001, in tons, calculated in accordance with B.1.d)(1) ;

i. the rolling, 12-month summation of the individual HAP emissions from all emissions units operating at the facility, in ton(s), i.e. the summation of all individual HAP emissions from “g” for the present month plus the previous 11 months of operation.

j. the rolling, 12-month summation for the total combined HAP emissions from all emissions units operating at the facility, in ton(s), i.e. the summation of all combined HAP emissions from “h” for the present month plus the previous 11 months of operation.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting the Central District Office.

(2) These emission units (K001, K002, K003, K004, K005, K006, K008, K009, K010, K011, K012, K013, K014, and P001) have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material usage, upon issuance of this permit.

c) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through 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.

(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 permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall 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. any exceedance of the rolling, 12-month individual HAP emission limitation; and

ii. any exceedance of the rolling, 12-month combined HAPs emission limitation.

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

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

d) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in B.1.a)(1) above shall be determined in accordance with the following methods:

a. <u>Emissions Limitations:</u>

Emissions of any single HAP shall not exceed 9.9 tons per rolling, 12-month period.

Emissions of total combined HAPs shall not exceed 24.9 tons per rolling, 12-month period.

<u>Applicable Compliance Method:</u>

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

For emission units K001, K002, K003, K004, K005, K006, K008, K009, K010, K011, K012, K013, K014, and P001 the permittee shall calculate HAP emissions by multiplying the individual HAP and combined HAP content of the material employed by the number of gallons of each material used as described in B.1.b)(1) above.

C. Emissions Unit Terms and Conditions

1. K005, Paint Final

Operations, Property and/or Equipment Description:

Paint final coating area

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

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

a. b)(1)e. and d)(3)

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

a. b)(1)c., b)(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(A)(3) *June 30, 2008*	The requirements established by this rule for volatile organic compound (VOC) emissions have been determined to be equivalent to the requirements established under OAC rule 3745-31-05(D), below. See b)(1)c., b)(2)a.
b.	OAC rule 3745-31-05(A)(3) *June 30, 2008*	See b)(2)b.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and MACT)	Emissions shall not exceed: 0.7 tons of volatile organic compounds (VOC) per rolling, 12-month period. See B.1.a)(1), b)(2)d.
d.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)c.
e.	ORC 3704.03(F)	See d)(3)

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source because the potential to emit for VOC is less than 10 tons/year taking into consideration the federally enforceable restrictions established pursuant to OAC rule 3745-31-05(D).

c. This emission unit will be used for coating miscellaneous metal parts with a daily usage of less than 10 gallons per day, therefor the VOC content limit requirements of OAC rule 3745-21-09(U)(1) do not apply.

d. The maximum monthly usage for emission unit K005 shall not exceed 10 gallons of cleaner, 6 gallons of coating and 6 gallons of cleanup.

c) Operational Restrictions

(1) The permittee shall not use more than 10 gallons of coating [as defined in OAC rule 3745-21-01(D)(50)] per day for the coating of miscellaneous metal parts.

d) Monitoring and/or Recordkeeping Requirements

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

a. The name and identification number of each material (coating, adhesive, solvent, thinner, cleaner) employed;

b. The number of gallons of each material employed in "a", above; and

c. The summation (in gallons) of all materials employed in "a", above.

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

a. The name and identification number of each material (coating, adhesive, solvent, thinner, cleaner) employed;

b. The VOC content of each material in “a”, above, in pounds per gallon, as applied;

c. The number of gallons of each material employed in “a”, above;

d. The total VOC emissions from all materials employed in “a”, above, in pounds and/or tons;

e. The total annual VOC emissions from all materials employed per rolling, 12-month period calculated by adding the current monthly total with the previous 11 month of operation, in tons.

f. The total monthly VOC emissions from all materials employed per rolling, 12-month period calculated by dividing the current rolling, 12-month VOC emissions by 12, in tons.

(3) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the incremental increase in emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year, or a modification that would result in the net increase (the net difference between the new allowable and the old allowable) in toxic air emissions greater or equal to 1.0 ton per year, would require modeling and the permittee to apply for and obtain a new FEPTIO.

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. any exceedance of the VOC emission limitation established in b)(1)c.; and

ii. any exceedance of the usage restrictions established in b)(2)d.

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).

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: 0.7 tons of volatile organic material (VOC) per rolling, 12-month period.

Applicable Compliance Method: Compliance is demonstrated through the recordkeeping established in d)(1) and d)(2).

g) Miscellaneous Requirements

(1) None.

2. K006, Final Assembly

Operations, Property and/or Equipment Description:

Final assembly line

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

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

a. b)(1)e and d)(3)

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

a. b)(1)c., b)(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(A)(3) *June 30, 2008*	The requirements established by this rule for volatile organic compound (VOC) emissions have been determined to be equivalent to the requirements established under OAC rule 3745-31-05(D), below. See b)(1)c., b)(2)a.
b.	OAC rule 3745-31-05(A)(3) *June 30, 2008*	See b)(2)b.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and MACT)	Emissions shall not exceed: 3.0 tons volatile organic compounds (VOC) per rolling, 12-month period. See B.1.a)(1), b)(2)d.
d.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)c.
e.	ORC 3704.03(F)	See d)(3)

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source because the potential to emit for each pollutant is less than 10 tons/year taking into consideration the federally enforceable restrictions established pursuant to OAC rule 3745-31-05(D).

c. This emission unit will be used for coating miscellaneous metal parts with a daily usage of less than 10 gallons per day, therefor the VOC content limit requirements of OAC rule 3745-21-09(U)(1) do not apply.

d. The maximum monthly usage for emission unit K006 shall not exceed 81 gallons of adhesives, 15 gallons of cleaner and 3 gallons of coating.

c) Operational Restrictions

(1) The permittee shall not use more than 10 gallons of coating [as defined in OAC rule 3745-21-01(D)(50)] per day for the coating of miscellaneous metal parts.

d) Monitoring and/or Recordkeeping Requirements

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

a. The name and identification number of each material (coating, adhesive, solvent, thinner, cleaner) employed;

b. The number of gallons of each material employed in "a", above; and

c. The summation (in gallons) of all materials employed in "a", above.

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

a. The name and identification number of each material (coating, adhesive, solvent, thinner, cleaner) employed;

b. The VOC content of each material in “a”, above, in pounds per gallon, as applied;

c. The number of gallons of each material employed in “a”, above;

d. The total VOC emissions from all materials employed in “a”, above, in pounds and/or tons;

e. The total annual VOC emissions from all materials employed per rolling, 12-month period calculated by adding the current monthly total with the previous 11 month of operation, in tons.

(3) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the incremental increase in emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year, or a modification that would result in the net increase (the net difference between the new allowable and the old allowable) in toxic air emissions greater or equal to 1.0 ton per year, would require modeling and the permittee to apply for and obtain a new FEPTIO.

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. any exceedance of the VOC emission limitation established in b)(1)c.; and

ii. any exceedance of the usage restrictions established in b)(2)d.

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).

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: 3.0 tons volatile organic compounds (VOC) per rolling, 12-month period.

Applicable Compliance Method: Compliance is demonstrated through the recordkeeping established in d)(1) and d)(2).

g) Miscellaneous Requirements

(1) None.

3. K008, Batch Lot

Operations, Property and/or Equipment Description:

Batch lot miscellaneous product assembly coating operation

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

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

a. b)(1)e. and d)(3)

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

a. b)(1)c., b)(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(A)(3) *June 30, 2008*	The requirements established by this rule for volatile organic compound (VOC) emissions have been determined to be equivalent to the requirements established under OAC rule 3745-31-05(D), below. See b)(1)c., b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) *June 30, 2008*	See b)(2)b.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and MACT)	Emissions shall not exceed: 4.1 tons volatile organic compounds (VOC) per rolling, 12-month period. See B.1.a)(1), b)(2)d.
d.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)c.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	ORC 3704.03(F)	See d)(3)

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source because the potential to emit for each pollutant is less than 10 tons/year taking into consideration the federally enforceable restrictions established pursuant to OAC rule 3745-31-05(D).

c. This emission unit will be used for coating miscellaneous metal parts with a daily usage of less than 10 gallons per day, therefor the VOC content limit requirements of OAC rule 3745-21-09(U)(1) do not apply.

d. The maximum monthly usage for emission unit K008 shall not exceed 115 gallons of adhesives, 15 gallons of cleaner and 5 gallons of coating.

c) Operational Restrictions

(1) The permittee shall not use more than 10 gallons of coating [as defined in OAC rule 3745-21-01(D)(50)] per day for the coating of miscellaneous metal parts.

d) Monitoring and/or Recordkeeping Requirements

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

a. The name and identification number of each material (coating, adhesive, solvent, thinner, cleaner) employed;

b. The number of gallons of each material employed in “a”, above; and

c. The summation (in gallons) of all materials employed in “a”, above.

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

a. The name and identification number of each material (coating, adhesive, solvent, thinner, cleaner) employed;

b. The VOC content of each material in “a”, above, in pounds per gallon, as applied;

c. The number of gallons of each material employed in “a”, above;

d. The total VOC emissions from all materials employed in “a”, above, in pounds and/or tons;

e. The total annual VOC emissions from all materials employed per rolling, 12-month period calculated by adding the current monthly total with the previous 11 month of operation, in tons.

(3) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the incremental increase in emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year, or a modification that would result in the net increase (the net difference between the new allowable and the old allowable) in toxic air emissions greater or equal to 1.0 ton per year, would require modeling and the permittee to apply for and obtain a new FEPTIO.

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. any exceedance of the VOC emission limitation established in b)(1)c.; and

ii. any exceedance of the material usage restrictions established in b)(2)d.

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).

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: 4.1 tons volatile organic compounds (VOC) per rolling, 12-month period.

Applicable Compliance Method: Compliance is demonstrated through the recordkeeping established in d)(1) and d)(2).

g) Miscellaneous Requirements

(1) None.

4. K009, Contact Cement Booth

Operations, Property and/or Equipment Description:

Contact cement booth

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

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

a. b)(1)g. and d)(9)

(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)c., b)(2)c.

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) *June 30, 2008*	The requirements established by this rule for volatile organic compound (VOC) emissions have been determined to be equivalent to the requirements established under OAC rule 3745-31-05(D), below. Emissions of particulate material less than 10 microns in diameter (PM_{10}) shall not exceed 4.41 tons per rolling, 12-month period. Emissions of particulate material less than 2.5 microns in diameter ($PM_{2.5}$) shall not exceed 4.41 tons per rolling, 12-month period. See b)(1)c., b)(2)a.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)(a)(ii) *June 30, 2008*	See b)(2)b.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and MACT)	Emissions shall not exceed: 3.30 tons VOC per rolling, 12-month period. See B.1.a)(1), b)(2)c.
d.	OAC rule 3745-17-07(A)	Visible emissions of fugitive dust from this emission unit shall not exceed twenty percent (20%) opacity as a three (3)-minute average.
e.	OAC rule 3745-17-11(C)	See c)(1), d)(3), d)(4), d)(5), d)(6), d)(7), d)(8)
f.	OAC rule 3745-21-09(U)	See b)(2)d.
g.	ORC 3704.03(F)	See d)(9)

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC, PM_{10} and $PM_{2.5}$ emissions from this air contaminant source because the potential to emit for each pollutant is less than 10 tons/year taking into consideration the federally enforceable restrictions established pursuant to OAC rule 3745-31-05(D).

c. The maximum allowable monthly usage for emission unit K009 is 100 gallons of adhesives and 7 gallons of cleaner.

d. This emission unit will be used for coating miscellaneous metal parts with a daily usage of less than 10 gallons per day, therefor the VOC content limit requirements of OAC rule 3745-21-09(U)(1) do not apply.

e. The PM_{10} and $PM_{2.5}$ emission limitations were established based on the potential emissions from this emissions unit and with consideration to the usage restrictions contained in b)(2)c., therefore, no additional Monitoring and Recordkeeping requirements will be established for the purpose of demonstrating compliance with the PM_{10} and $PM_{2.5}$ emissions.

c) Operational Restrictions

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

(2) The permittee shall not use more than 10 gallons of coating [as defined in OAC rule 3745-21-01(D)(50)] per day for the coating of miscellaneous metal parts.

d) Monitoring and/or Recordkeeping Requirements

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

a. The name and identification number of each material (coating, adhesive, solvent, thinner, cleaner) employed;

b. The number of gallons of each material employed in "a", above; and

c. The summation (in gallons) of all materials employed in "a", above.

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

a. The name and identification number of each material (coating, adhesive, solvent, thinner, cleaner) employed;

b. The VOC content of each material in "a", above, in pounds per gallon, as applied;

c. The number of gallons of each material employed in "a", above;

d. The total VOC emissions from all materials employed in "a", above, in pounds and/or tons;

e. The total annual VOC emissions from all materials employed per rolling, 12-month period calculated by adding the current monthly total with the previous 11 month of operation, in tons.

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

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

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

(6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

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

(7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(8) The permittee shall perform daily checks, when the emissions unit is 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 this emissions unit. 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. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. 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 (d) 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.

(9) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the incremental increase in emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year, or a modification that would result in the net increase (the net difference between the new allowable and the old allowable) in toxic air emissions greater or equal to 1.0 ton per year, would require modeling and the permittee to apply for and obtain a new FEPTIO.

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. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer’s recommendations (with any modifications made by the permittee) when the emission units were in operation;

ii. any exceedance of the VOC emission limitations established in b)(1)c.; and

iii. any exceedance of the material usage limitations established in b)(2)c.

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).

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

Applicable Compliance Method: 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).

b. Emission Limitation: 3.30 tons VOC per rolling, 12-month period.

Applicable Compliance Method: Compliance is demonstrated though the recordkeeping established in d)(1) and d)(2).

c. Emission Limitation: Emissions of particulate material less than 10 microns in diameter (PM_{10}) shall not exceed 4.41 tons per rolling, 12-month period.

Applicable Compliance Method: The following formula shall be used to demonstrate compliance with the PM_{10} emission rate:

E = (U)*(D)*(S)*(1-TE)*(1-CE)*8760 hrs/yr / 2,000 lbs/ton

Where:

E = particulate matter emission rate (lbs/hr)
U = actual coating usage rate (gal/hr)
D = density of coating (lbs/gal)
S = total solids percent by weight
TE = transfer efficiency of coating equipment
CE = control equipment efficiency

If required, the permittee shall demonstrate compliance with this emission limitation by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

d. Emission Limitation: Emissions of particulate material less than 2.5 microns in diameter ($PM_{2.5}$) shall not exceed 4.41 tons per rolling, 12-month period.

Applicable Compliance Method: The following formula shall be used to demonstrate compliance with the $PM_{2.5}$ emission rate:

E = (U)*(D)*(S)*(1-TE)*(1-CE)*8760 hrs/yr / 2,000 lbs/ton

Where:

E = particulate matter emission rate (lbs/hr)
U = actual coating usage rate (gal/hr)
D = density of coating (lbs/gal)
S = total solids percent by weight
TE = transfer efficiency of coating equipment
CE = control equipment efficiency

If required, the permittee shall demonstrate compliance with this emission limitation by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

g) Miscellaneous Requirements

(1) None.

5. K010, Glue Table

Operations, Property and/or Equipment Description:

Glue table coating operation

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

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

a. b)(1)e., d)(3)

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

a. b)(1)c., b)(2)c.

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) *June 30, 2008*	The requirements established by this rule for volatile organic compound (VOC) emissions have been determined to be equivalent to the requirements established under OAC rule 3745-31-05(D), below. Emissions of particulate material less than 10 microns in diameter (PM_{10}) shall not exceed 0.17 tons per rolling, 12-month period. Emissions of particulate material less than 2.5 microns in diameter ($PM_{2.5}$) shall not exceed 0.17 tons per rolling, 12-month period. See b)(1)c., b)(2)a., b)(2)e.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3) *June 30, 2008*	See b)(2)b.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and MACT)	Emissions shall not exceed: 0.85 tons VOC per rolling, 12-month period See B.1.a)(1), b)(2)c.
d.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)d.
e.	ORC 3704.03(F)	See d)(3)

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC, PM_{10} and $PM_{2.5}$ emissions from this air contaminant source because the potential to emit for each pollutant is less than 10 tons/year taking into consideration the federally enforceable restrictions established pursuant to OAC rule 3745-31-05(D).

c. The maximum monthly usage for emission unit K010 shall not exceed 25 gallons of adhesive and 3 gallons of cleaner.

d. This emission unit will be used for coating miscellaneous metal parts with a daily usage of less than 10 gallons per day, therefor the VOC content limit requirements of OAC rule 3745-21-09(U)(1) do not apply.

e. The PM_{10} and $PM_{2.5}$ emission limitations were established based on the potential emissions from this emissions unit and with consideration to the usage restrictions contained in b)(2)c., therefore, no additional Monitoring and

Recordkeeping requirements will be established for the purpose of demonstrating compliance with the PM_{10} and $PM_{2.5}$ emissions.

c) Operational Restrictions

(1) The permittee shall not use more than 10 gallons of coating [as defined in OAC rule 3745-21-01(D)(50)] per day for the coating of miscellaneous metal parts.

d) Monitoring and/or Recordkeeping Requirements

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

a. The name and identification number of each material (coating, adhesive, solvent, thinner, cleaner) employed;

b. The number of gallons of each material employed in “a”, above; and

c. The summation (in gallons) of all materials employed in “a”, above.

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

a. The name and identification number of each material (coating, adhesive, solvent, thinner, cleaner) employed;

b. The VOC content of each material in “a”, above, in pounds per gallon, as applied;

c. The number of gallons of each material employed in “a”, above;

d. The total VOC emissions from all materials employed in “a”, above, in pounds and/or tons;

e. The total annual VOC emissions from all materials employed per rolling, 12-month period calculated by adding the current monthly total with the previous 11 month of operation, in tons.

(3) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the incremental increase in emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year, or a modification that would result in the net increase (the net difference between the new allowable and the old allowable) in toxic air emissions greater or equal to 1.0 ton per year, would require modeling and the permittee to apply for and obtain a new FEPTIO.

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. any exceedance of the VOC emission limitation established in b)(1)c.; and

ii. any exceedance of the material usage limitations established in b)(2)c.

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).

f) Testing Requirements

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

a. <u>Emission Limitation:</u> 0.85 tons VOC per rolling, 12-month period

<u>Applicable Compliance Method:</u> Compliance is demonstrated through the recordkeeping established in d)(1) and d)(2).

b. <u>Emission Limitation:</u> Emissions of particulate material less than 10 microns in diameter (PM_{10}) shall not exceed 0.17 tons per rolling, 12-month period.

<u>Applicable Compliance Method:</u> The following formula shall be used to demonstrate compliance with the PM_{10} emission rate:

E = (U)*(D)*(S)*(1-TE)*(1-CE)*8760 hrs/yr / 2,000 lbs/ton

Where:

E = particulate matter emission rate (lbs/hr)
U = actual coating usage rate (gal/hr)
D = density of coating (lbs/gal)
S = total solids percent by weight
TE = transfer efficiency of coating equipment
CE = control equipment efficiency

If required, the permittee shall demonstrate compliance with this emission limitation by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

c. Emission Limitation: Emissions of particulate material less than 2.5 microns in diameter ($PM_{2.5}$) shall not exceed 0.17 tons per rolling, 12-month period.

Applicable Compliance Method: The following formula shall be used to demonstrate compliance with the $PM_{2.5}$ emission rate:

E = (U)*(D)*(S)*(1-TE)*(1-CE)*8760 hrs/yr / 2,000 lbs/ton

Where:

E = particulate matter emission rate (lbs/hr)
U = actual coating usage rate (gal/hr)
D = density of coating (lbs/gal)
S = total solids percent by weight
TE = transfer efficiency of coating equipment
CE = control equipment efficiency

If required, the permittee shall demonstrate compliance with this emission limitation by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

g) Miscellaneous Requirements

(1) None.

6. K011, Fabrication

Operations, Property and/or Equipment Description:

Fabrication area

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

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

a. b)(1)e. and d)(3)

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

a. b)(1)c., b)(2)c.

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), as effective 11/30/01	The requirements established by this rule for volatile organic compound (VOC) emissions have been determined to be equivalent to the requirements established under OAC rule 3745-31-05(D), below. See b)(1)c., b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and MACT)	Emissions shall not exceed: 2.2 tons VOC per rolling, 12-month period See B.1.a)(1), b)(2)c.
d.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)d.
e.	ORC 3704.03(F)	See d)(3)

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source because the potential to emit for each pollutant is less than 10 tons/year taking into consideration the federally enforceable restrictions established pursuant to OAC rule 3745-31-05(D).

c. The maximum monthly usage for emission unit K011 shall not exceed 8 gallons of adhesive, 250 gallons of coating and 41 gallons of cleaner.

d. This emission unit will be used for coating miscellaneous metal parts with a daily usage of greater than 10 gallons per day as indicated in the permittee's application, therefor the VOC content limit requirements of OAC rule 3745-21-09(U)(1) contained in the following table apply, with the exception of application of a customized topcoat and any related customized single coat to motor vehicles if the maximum number of motor vehicles is less than thirty-five (35) per day:

OAC rule	VOC limit per gallon of coating	Type of coating
3745-21-09(U)(1)(a)	4.3 pounds	Clearcoat
3745-21-09(U)(1)(b)	4.0 pounds	zinc rich primer
3745-21-09(U)(1)(c)	3.5 pounds	extreme performance coating
3745-21-09(U)(1)(d)	3.5 pounds	any coating dried at temperatures <200`F
3745-21-09(U)(1)(g)	4.9 pounds	body primer for glass adhesion
3745-21-	3.0 pounds	any coating not regulated under 3745-21-

09(U)(1)(i)		09(U)(1)(a)-(U)(1)(h)

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. The name and identification number of each material (coating, adhesive, solvent, thinner, cleaner) employed;

b. The number of gallons of each material employed in “a”, above; and

c. The summation (in gallons) of all materials employed in “a”, above.

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

a. The name and identification number of each material (coating, adhesive, solvent, thinner, cleaner) employed;

b. The VOC content of each material in “a”, above, in pounds per gallon, as applied;

c. The number of gallons of each material employed in “a”, above;

d. The total VOC emissions from all materials employed in “a”, above, in pounds and/or tons;

e. The total annual VOC emissions from all materials employed per rolling, 12-month period calculated by adding the current monthly total with the previous 11 month of operation, in tons.

(3) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the incremental increase in emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year, or a modification that would result in the net increase (the net difference between the new allowable and the old allowable) in toxic air emissions greater or equal to 1.0 ton per year, would require modeling and the permittee to apply for and obtain a new FEPTIO.

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. any exceedance of the VOC emission limitation established in b)(1)c.; and

ii. any exceedance of the material usage limitation established in b)(2)c.

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).

f) Testing Requirements

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

a. <u>Emission Limitation:</u> 2.2 tons VOC per rolling, 12-month period

<u>Applicable Compliance Method:</u> Compliance is demonstrated through the recordkeeping established in d)(1) and d)(2).

g) Miscellaneous Requirements

(1) None.

7. K012, Pre-Delivery

Operations, Property and/or Equipment Description:

Pre-delivery area coating operation

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

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

a. b)(1)e. and d)(3)

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

a. b)(1)c., b)(2)c.

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) *June 30, 2008*	The requirements established by this rule for volatile organic compound (VOC) emissions have been determined to be equivalent to the requirements established under OAC rule 3745-31-05(D), below. See b)(1)c., b)(2)a.
b.	OAC rule 3745-31-05(A)(3) *June 30, 2008*	See b)(2)b.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and MACT)	Emissions shall not exceed: 4.0 tons VOC per rolling, 12-month period See B.1.a)(1), b)(2)c.
d.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)d.
e.	ORC 3704.03(F)	See d)(3)

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source because the potential to emit for each pollutant is less than 10 tons/year taking into consideration the federally enforceable restrictions established pursuant to OAC rule 3745-31-05(D).

c. The maximum monthly usage for emission unit K012 shall not exceed 10 gallons of adhesive, 7 gallons of coating and 100 gallons of cleaner.

d. This emission unit will be used for coating miscellaneous metal parts with a daily usage of less than 10 gallons per day, therefor the VOC content limit requirements of OAC rule 3745-21-09(U)(1) do not apply.

c) Operational Restrictions

(1) The permittee shall not use more than 10 gallons of coating [as defined in OAC rule 3745-21-01(D)(50)] per day for the coating of miscellaneous metal parts.

d) Monitoring and/or Recordkeeping Requirements

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

a. The name and identification number of each material (coating, adhesive, solvent, thinner, cleaner) employed;

b. The number of gallons of each material employed in "a", above; and

c. The summation (in gallons) of all materials employed in "a", above.

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

a. The name and identification number of each material (coating, adhesive, solvent, thinner, cleaner) employed;

b. The VOC content of each material in “a”, above, in pounds per gallon, as applied;

c. The number of gallons of each material employed in “a”, above;

d. The total VOC emissions from all materials employed in “a”, above, in pounds and/or tons;

e. The total annual VOC emissions from all materials employed per rolling, 12-month period calculated by adding the current monthly total with the previous 11 month of operation, in tons.

(3) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the incremental increase in emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year, or a modification that would result in the net increase (the net difference between the new allowable and the old allowable) in toxic air emissions greater or equal to 1.0 ton per year, would require modeling and the permittee to apply for and obtain a new FEPTIO.

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. any exceedance of the VOC emission limitation established in b)(1)c.; and

ii. any exceedance of the material usage limitation established in b)(2)c.

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).

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: 4.0 tons VOC per rolling, 12-month period

Applicable Compliance Method: Compliance is demonstrated through the recordkeeping established in d)(1) and d)(2).

g) Miscellaneous Requirements

(1) None.

8. K013, Paint/Prep

Operations, Property and/or Equipment Description:

Paint department - preparation coating area

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

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

a. b)(1)f., d)(3), d)(4), d)(5), d)(6), e)(2), b)(1)d., b)(1)f.

(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)c., b)(2)c.

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) *June 30, 2008*	The requirements established by this rule for volatile organic compound (VOC) emissions have been determined to be equivalent to the requirements established under OAC rule 3745-31-05(D), below. See b)(1)c., b)(2)a.
b.	OAC rule 3745-31-05(A)(3) *June 30, 2008*	See b)(2)c.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and MACT)	Emissions shall not exceed: 3.6 tons VOC per rolling, 12-month period See B.1.a)(1), b)(2)c.
d.	OAC rule 3745-31-05(E) (State only restriction to pass modeling requirements for xylene)	Usage of OTO Degreaser (cleaner) shall not exceed 2 gallons per day. See d)(1), e)(1)

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)d.
f.	ORC 3704.03(F)	See d)(3), d)(4), d)(5), d)(6), e)(2).

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source because the potential to emit for each pollutant is less than 10 tons/year taking into consideration the federally enforceable restrictions established pursuant to OAC rule 3745-31-05(D).

c. The maximum monthly usage for emission unit K013 shall not exceed 5 gallons of adhesive, 28 gallons of cleanup, 526 gallons of coating and 47 gallons of cleaner.

d. This emission unit will be used for coating miscellaneous metal parts with a daily usage of greater than 10 gallons per day as indicated in the permittee's application, therefor the VOC content limit requirements of OAC rule 3745-21-09(U)(1) contained in the following table apply, with the exception of application of a customized topcoat and any related customized single coat to motor vehicles if the maximum number of motor vehicles is less than thirty-five (35) per day:

OAC rule	VOC limit per gallon of coating	Type of coating
3745-21-09(U)(1)(a)	4.3 pounds	Clearcoat
3745-21-09(U)(1)(b)	4.0 pounds	zinc rich primer
3745-21-	3.5 pounds	extreme performance coating

09(U)(1)(c)		
3745-21-09(U)(1)(d)	3.5 pounds	any coating dried at temperatures <200`F
3745-21-09(U)(1)(g)	4.9 pounds	body primer for glass adhesion
3745-21-09(U)(1)(i)	3.0 pounds	any coating not regulated under 3745-21-09(U)(1)(a)-(U)(1)(h)

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. The name and identification number of each material (coating, adhesive, solvent, thinner, cleaner) employed;

b. The number of gallons of each material employed in “a”, above; and

c. The total amount of OTO Degreaser (in gallons) applied per day.

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

a. The name and identification number of each material (coating, adhesive, solvent, thinner, cleaner) employed;

b. The VOC content of each material in “a”, above, in pounds per gallon, as applied;

c. The number of gallons of each material employed in “a”, above;

d. The total VOC emissions from all materials employed in “a”, above, in pounds and/or tons;

e. The total annual VOC emissions from all materials employed per rolling, 12-month period calculated by adding the current monthly total with the previous 11 month of operation, in tons.

(3) The **FEPTIO** application for this/these emissions unit(s), **K013**, was evaluated based on the actual materials and the design parameters of the emissions unit's(s’) exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air

dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

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

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

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

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

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

   TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants or "worst case" toxic contaminant(s):

   Toxic Contaminant: **Xylene**
   TLV (mg/m3): **434.2**
   Maximum Hourly Emission Rate (lbs/hr): **9.0**
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **10,110**
   MAGLC (ug/m3): **10,338**

The permittee, having demonstrated that emissions of **xylene**, from emissions unit(s) **K013**, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit(s) at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

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

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

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

(5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”:

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

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

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

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

(6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) The permittee shall 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. any exceedance of the VOC emission limitation established in b)(1)c.;

ii. any exceedance of the material usage limitation established in b)(2)c.; and

iii. any exceedance of the daily usage limitation established in b)(1)d.

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

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: 3.6 tons VOC per rolling, 12-month period

Applicable Compliance Method: Compliance is demonstrated through the recordkeeping established in d)(1) and d)(2).

b. Emission Limitation: Usage of OTO Degreaser (cleaner) shall not exceed 2 gallons per day

Applicable Compliance Method: Compliance is demonstrated through the recordkeeping established in d)(1).

g) Miscellaneous Requirements

(1) None.

9. P001, Paint Mix Room

Operations, Property and/or Equipment Description:

Paint mix room

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

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

a. d)(3), b)(1)e.

(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)c., b)(2)c.

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) *June 30, 2008*	The requirements established by this rule for volatile organic compound (VOC) emissions have been determined to be equivalent to the requirements established under OAC rule 3745-31-05(D), below. See b)(2)a. and b)(1)c.
b.	OAC rule 3745-31-05(A)(3) *June 30, 2008*	See b)(2)b.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and MACT)	Emissions shall not exceed: 1.21 tons VOC per rolling, 12-month period See B.1.a)(1), b)(2)c.
d.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)d.
e.	ORC 3704.03(F)	See d)(3)

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source because the potential to emit for each pollutant is less than 10 tons/year taking into consideration the federally enforceable restrictions established pursuant to OAC rule 3745-31-05(D).

c. The maximum monthly usage for emission unit P001 shall not exceed 347 gallons of thinner.

d. This emission unit will be used for coating miscellaneous metal parts with a daily usage of greater than 10 gallons per day as indicated in the permittee's application, therefor the VOC content limit requirements of OAC rule 3745-21-09(U)(1) contained in the following table apply, with the exception of application of a customized topcoat and any related customized single coat to motor vehicles if the maximum number of motor vehicles is less than thirty-five (35) per day:

OAC rule	VOC limit per gallon of coating	Type of coating
3745-21-09(U)(1)(a)	4.3 pounds	Clearcoat
3745-21-09(U)(1)(b)	4.0 pounds	zinc rich primer
3745-21-09(U)(1)(c)	3.5 pounds	extreme performance coating
3745-21-09(U)(1)(d)	3.5 pounds	any coating dried at temperatures <200`F
3745-21-09(U)(1)(g)	4.9 pounds	body primer for glass adhesion
3745-21-	3.0 pounds	any coating not regulated under 3745-21-

09(U)(1)(i)		09(U)(1)(a)-(U)(1)(h)

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. The name and identification number of each material (coating, adhesive, solvent, thinner, cleaner) employed;

b. The number of gallons of each material employed in “a”, above; and

c. The summation (in gallons) of all materials employed in “a”, above.

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

a. The name and identification number of each material (coating, adhesive, solvent, thinner, cleaner) employed;

b. The VOC content of each material in “a”, above, in pounds per gallon, as applied;

c. The number of gallons of each material employed in “a”, above;

d. The total VOC emissions from all materials employed in “a”, above, in pounds and/or tons;

e. The total annual VOC emissions from all materials employed per rolling, 12-month period calculated by adding the current monthly total with the previous 11 month of operation, in tons.

(3) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the incremental increase in emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year, or a modification that would result in the net increase (the net difference between the new allowable and the old allowable) in toxic air emissions greater or equal to 1.0 ton per year, would require modeling and the permittee to apply for and obtain a new FEPTIO.

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. any exceedance of the VOC emission limitation established in b)(1)c.; and

ii. any exceedance of the material usage limitation established in b)(2)c.

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).

f) Testing Requirements

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

a. <u>Emission Limitation:</u> 1.21 tons VOC per rolling, 12-month period

<u>Applicable Compliance Method:</u> This emission limitation was derived by multiplying the monthly material usage by the pounds of VOC per gallon, then multiplying by 10% to conservatively estimate the amount of material flashed off in the mixing room prior to application. The other 90% of VOC emissions are credited to the associated booth. Compliance is demonstrated through the recordkeeping established in d)(1) and d)(2).

g) Miscellaneous Requirements

(1) None.

10. Emissions Unit Group -Spray booths: K001, K002, K003, K004, K014

EU ID	Operations, Property and/or Equipment Description
K001	Devilbiss paint booth No. 1
K002	Devilbiss paint booth No. 2
K003	Devilbiss paint booth No. 3
K004	Devilbiss paint booth No. 4
K014	Kroyer paint booth No. 5

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

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

a. b)(1)f., d)(8), d)(9), d)(10), d)(11), d)(12), e)(2)

(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)c., b)(2)c.

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) *June 30, 2008*	The requirements established by this rule for volatile organic compound (VOC) emissions have been determined to be equivalent to the requirements established under OAC rule 3745-31-05(D), below. Emissions of particulate material less than 10 microns in diameter (PM_{10}) shall not exceed: **K001-** 3.0 tons per rolling, 12-month period **K002-** 2.60 tons per rolling, 12-month period **K003-** 8.33 tons per rolling, 12-month

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		period **K004-** 4.77 tons per rolling, 12-month period **K014-** 4.40 tons per rolling, 12-month period Emissions of particulate material less than 2.5 microns in diameter ($PM_{2.5}$) shall not exceed: **K001-** 3.0 tons per rolling, 12-month period **K002-** 2.60 tons per rolling, 12-month period **K003-** 8.33 tons per rolling, 12-month period **K004-** 4.77 tons per rolling, 12-month period **K014-** 4.40 tons per rolling, 12-month period See b)(1)c., b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) *June 30, 2008*	See b)(2)b.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and MACT)	Emissions shall not exceed: **K001-** 3.50 tons VOC per rolling, 12-month period **K002-** 4.90 tons VOC per rolling, 12-month period **K003-** 12.30 tons VOC per rolling, 12-month period **K004-** 7.30 tons VOC per rolling, 12-month period **K014-** 6.10 tons VOC per rolling, 12-month period See B.1.a)(1), b)(2)c.
d.	OAC rule 3745-17-11(C)	See c)(1), d)(3), d)(4), d)(5), d)(6), d)(7)
e.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)d.
f.	ORC 3704.03(F)	d)(8), d)(9), d)(10), d)(11), d)(12), e)(2)

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph

(A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

i. The (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM_{10} and $PM_{2.5}$ emissions from K003 and K004 because the potential to emit for PM_{10} and $PM_{2.5}$ is less than 10 tons/year taking into consideration the federally enforceable restrictions established pursuant to OAC rule 3745-31-05(D).

ii. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from K001, K002, K004 and K014 because the potential to emit for VOC is less than 10 tons/year taking into consideration the federally enforceable restrictions established pursuant to OAC rule 3745-31-05(D).

c. The maximum monthly usage (coating, cleaner, cleanup) is reflected in the following table:

Emission Unit	Coating (gal/month)	Cleanup (gal/month)	Cleaner (gal/month)
K001	101	34	9
K002	140	34	16
K003	434	81	14
K004	198	81	17
K014	236	0	13

d. These emission units unit will be used for coating miscellaneous metal parts with a daily usage of less than 10 gallons per day, therefor the VOC content limit requirements of OAC rule 3745-21-09(U)(1) do not apply.

e. The PM_{10} and $PM_{2.5}$ emission limitations were established based on the potential emissions from this emissions unit and with consideration to the usage restrictions contained in b)(2)c., therefore, no additional Monitoring and Recordkeeping requirements will be established for the purpose of demonstrating compliance with the PM_{10} and $PM_{2.5}$ emissions.

c) Operational Restrictions

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

(2) The permittee shall not use more than 10 gallons of coating [as defined in OAC rule 3745-21-01(D)(50)] per day for the coating of miscellaneous metal parts in these emission units (**K001, K002, K003, K004 and K014**).

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for these emission units (**K001, K002, K003, K004 and K014)**:

a. The name and identification number of each material (coating, adhesive, solvent, thinner, cleaner) employed;

b. The number of gallons of each material employed in "a", above; and

c. The summation (in gallons) of all materials employed in "a", above.

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

a. The name and identification number of each material (coating, adhesive, solvent, thinner, cleaner) employed;

b. The VOC content of each material in "a", above, in pounds per gallon, as applied;

c. The number of gallons of each material employed in "a", above;

d. The total VOC emissions from all materials employed in "a", above, in pounds and/or tons;

e. The total annual VOC emissions from all materials employed per rolling, 12-month period calculated by adding the current monthly total with the previous 11 month of operation, in tons.

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

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

copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

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

(6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

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

(7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(8) The PTIO application for these emissions units, **K003, K004 and K014**, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminants emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

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

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for

Chemical Substances and Physical Agents Biological Exposure Indices"; or

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

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

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

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

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

K003:
Toxic Contaminant: **Methanol**
TLV (mg/m3): **262.1**
Maximum Hourly Emission Rate (lbs/hr): **18.96**
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **2954**
MAGLC (ug/m3): **6240**

K004
Toxic Contaminant: **Methanol**
TLV (mg/m3): **262.1**
Maximum Hourly Emission Rate (lbs/hr): **18.96**
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **2954**
MAGLC (ug/m3): **6240**

K014
Toxic Contaminant: **Xylene**
TLV (mg/m3): **434.2**
Maximum Hourly Emission Rate (lbs/hr): **21.99**
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **3224**
MAGLC (ug/m3): **10338**

The permittee, has demonstrated that emissions of **Methanol and Xylene**, from emissions units **K003, K004 and K014**, are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

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

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

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

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

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

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

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

(11) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

(12) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary for emission units **K001** and **K002** because the incremental increase in emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year, or a modification that would result in the net increase (the net difference between the new allowable and the old allowable) in toxic air emissions greater or equal to 1.0 ton per year, would require modeling and the permittee to apply for and obtain a new FEPTIO.

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. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any modifications made by the permittee) when the emission units were in operation;

ii. any exceedance of the VOC emission limitations established in b)(1)c.; and

iii. any exceedance of the material usage limitation established in b)(2)c.

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

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: Emissions of particulate material less than 10 microns in diameter (PM_{10}) shall not exceed:

K001- 3.0 tons per rolling, 12-month period
K002- 2.60 tons per rolling, 12-month period
K003- 8.33 tons per rolling, 12-month period
K004- 4.77 tons per rolling, 12-month period
K014- 4.40 tons per rolling, 12-month period

Applicable Compliance Method: The following formula shall be used to demonstrate compliance with the PM_{10} emission rate:

E = (U)*(D)*(S)*(1-TE)*(1-CE)*8760 hrs/yr / 2,000 lbs/ton

Where:

E = particulate matter emission rate (lbs/hr)
U = actual coating usage rate (gal/hr)
D = density of coating (lbs/gal)
S = total solids percent by weight
TE = transfer efficiency of coating equipment
CE = control equipment efficiency

If required, the permittee shall demonstrate compliance with this emission limitation by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

b. Emission Limitation: Emissions of particulate material less than 2.5 microns in diameter ($PM_{2.5}$) shall not exceed:

K001- 3.0 tons per rolling, 12-month period
K002- 2.60 tons per rolling, 12-month period
K003- 8.33 tons per rolling, 12-month period
K004- 4.77 tons per rolling, 12-month period
K014- 4.40 tons per rolling, 12-month period

Applicable Compliance Method: The following formula shall be used to demonstrate compliance with the $PM_{2.5}$ emission rate:
E = (U)*(D)*(S)*(1-TE)*(1-CE)*8760 hrs/yr / 2,000 lbs/ton

Where:

E = particulate matter emission rate (lbs/hr)
U = actual coating usage rate (gal/hr)
D = density of coating (lbs/gal)
S = total solids percent by weight
TE = transfer efficiency of coating equipment
CE = control equipment efficiency

If required, the permittee shall demonstrate compliance with this emission limitation by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

c. Emission Limitation:
K001- 3.50 tons VOC per rolling, 12-month period
K002- 4.90 tons VOC per rolling, 12-month period
K003- 12.30 tons VOC per rolling, 12-month period
K004- 7.30 tons VOC per rolling, 12-month period
K014- 6.10 tons VOC per rolling, 12-month period

Applicable Compliance Method: Compliance is demonstrated through the recordkeeping established in d)(1) and d)(2).

g) Miscellaneous Requirements

(1) None.