



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

12/4/2015

Justin Apgar
Superior Marine Ways - South Point
P.O. Box 519
South Point, OH 45680

Certified Mail

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0744000187
Permit Number: P0119493
Permit Type: Administrative Modification
County: Lawrence

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Portsmouth City Health Dept., Air Pollution Unit at (740)353-5156 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: Portsmouth



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Superior Marine Ways - South Point**

Facility ID:	0744000187
Permit Number:	P0119493
Permit Type:	Administrative Modification
Issued:	12/4/2015
Effective:	12/4/2015
Expiration:	3/9/2025



Division of Air Pollution Control
Permit-to-Install and Operate
for
Superior Marine Ways - South Point

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Final Permit-to-Install and Operate
Superior Marine Ways - South Point
Permit Number: P0119493
Facility ID: 0744000187
Effective Date: 12/4/2015

Authorization

Facility ID: 0744000187
Application Number(s): M0003580
Permit Number: P0119493
Permit Description: Administrative Permit Modification to add the applicability of 40 CFR 63 Subpart II to EU's K001, K002 and K003 and add a dust collection system to EU P001 due to USEPA Consent Order.
Permit Type: Administrative Modification
Permit Fee: \$550.00
Issue Date: 12/4/2015
Effective Date: 12/4/2015
Expiration Date: 3/9/2025
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Superior Marine Ways - South Point
5852 Co Rd 1
South Point, OH 45680

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

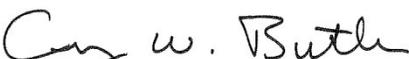
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Final Permit-to-Install and Operate
Superior Marine Ways - South Point
Permit Number: P0119493
Facility ID: 0744000187
Effective Date: 12/4/2015

Authorization (continued)

Permit Number: P0119493

Permit Description: Administrative Permit Modification to add the applicability of 40 CFR 63 Subpart II to EU's K001, K002 and K003 and add a dust collection system to EU P001 due to USEPA Consent Order.

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

Emissions Unit ID:	K001
Company Equipment ID:	Outdoor Marine Vessel Coating
Superseded Permit Number:	P0117518
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Building 1 Paint Operations
Superseded Permit Number:	P0117518
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Building 2 Painting Operations
Superseded Permit Number:	P0117518
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P001
Company Equipment ID:	Indoor Abrasive Blasting
Superseded Permit Number:	P0117518
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Superior Marine Ways - South Point
Permit Number: P0119493
Facility ID: 0744000187
Effective Date: 12/4/2015

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



Final Permit-to-Install and Operate
Superior Marine Ways - South Point
Permit Number: P0119493
Facility ID: 0744000187
Effective Date: 12/4/2015

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart II, National Emissions Standards for Hazardous Air Pollutant Emissions from Shipbuilding and Ship Repair (Surface Coating): K001, K002 and K003

The complete MACT requirements including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.



Final Permit-to-Install and Operate
Superior Marine Ways - South Point
Permit Number: P0119493
Facility ID: 0744000187
Effective Date: 12/4/2015

C. Emissions Unit Terms and Conditions

1. K001, Outdoor Marine Vessel Coating

Operations, Property and/or Equipment Description:

Outdoor Marine Vessel Coating of barge decks, barge interiors and barge repair.

Administrative modification to add applicability of the 40 CFR Part 63, Subpart II (Shipbuilding and Repair) MACT due to USEPA Administrative Consent Order.

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

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

a. None.

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

a. None.

b) **Applicable Emissions Limitations and/or Control Requirements**

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions from all coating and cleanup materials employed shall not exceed 161.75 pounds per day and 10.21 tons per year.</p> <p>The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d).</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-21-09(U)(1)(d)	The VOC content of the coating employed on the barge interiors shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-21-09(U)	The barge deck and barge repair are exempt from this rule based on OAC rule 3734-21-09(U)(2)(a) since these are exterior marine vessels.
d.	40 CFR Part 63, Subpart II (40 CFR 63.780 – 63.789)	See b)(2)b and b)(2)c.
e.	40 CFR Part 63.1 – 63.15	Table 1 to Subpart II of Part 63 – General Provisions of Applicability to Subpart II lists which parts of the General Provisions in 40 CFR 63.1 – 63.15 apply.

(2) Additional Terms and Conditions

- a. The daily VOC emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- b. No owner or operator shall cause or allow the application of any coating to a ship with an as-applied VOHAP content exceeding the applicable limit given in Table 2 of 40 CFR Part 63, Subpart II, as determined by the procedures described in 40 CFR 63.785(c)(1) through (c)(3).
- c. Each owner or operator shall ensure that:
 - i. all handling and transfer of VOHAP-containing materials to and from containers, tanks, vats, drums, and piping systems is conducted in a manner that minimizes spills; and
 - ii. all containers, tanks, vats, drums, and piping systems are free of cracks, holes and other defects and remain closed unless materials are being added to or removed from them.

c) Operational Restrictions

- (1) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup materials employed;

- c. the VOC content of each coating and cleanup material employed, in pounds per gallon; and
 - d. the total VOC emissions from all the coating and cleanup materials employed, in pounds [i.e., the sum of d)(1)b times d)(1)c for each coating and cleanup material employed].
- (2) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).
- e) Reporting Requirements
 - (1) The permittee shall notify the Director (Portsmouth Local Air Agency) in writing of each record showing a coating, used for barge interiors, greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (Portsmouth Local Air Agency) within 30 days after the exceedance occurs.
 - (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
 - (3) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).
- 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:

VOC emissions from all coating and cleanup materials employed shall not exceed 161.75 pounds per day.

Applicable Compliance Method:

The daily VOC emission limitation was determined based on the sum of the following:

Determine the daily emissions from the barge decks, barge interiors and barge repair parts by multiplying the maximum amount of coating and cleanup material used (gal/day) for each by the maximum VOC content of the coating and cleanup material (lbs/gal) for each.
 - b. Emission Limitation:

VOC emissions from all coating and cleanup materials employed shall not exceed 10.21 tons per year.



Applicable Compliance Method:

The annual VOC emission limitation was determined based on the sum of the following:

Determine the annual emissions from the barge decks, barge interiors and barge repair parts by multiplying the maximum amount of coating and cleanup material used (gal/year) for each by the maximum VOC content of the coating and cleanup material (lbs/gal) for each, and then dividing by 2000 lbs/ton.

Compliance with this emission limitation shall be based on the record keeping requirements specified in d)(1).

- g) Miscellaneous Requirements
 - (1) None.

2. K002, Building 1 Coating Operations

Operations, Property and/or Equipment Description:

Building 1 Coating Operation - coating of new/refurbished boats and miscellaneous metal parts.

Administrative modification to add applicability of the 40 CFR Part 63, Subpart II (Shipbuilding and Repair) MACT due to USEPA Administrative Consent Order.

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

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

a. None.

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

a. None.

b) **Applicable Emissions Limitations and/or Control Requirements**

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions from all coating and cleanup materials employed shall not exceed 123.14 pounds per day and 0.52 ton per year.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-21-09(U)	<p>The new/refurbished boats are exempt from this rule based on OAC rule 3734-21-09(U)(2)(a) since these are exterior marine vessels.</p> <p>The miscellaneous metal parts are exempt from this rule based on OAC rule 3745-21-09(U)(2)(e)(iii) since they do not use more than 10 gallons per day.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	40 CFR Part 63, Subpart II (40 CFR 63.780 – 63.789)	See b)(2)b and b)(2)c.
d.	40 CFR Part 63.1 – 63.15	Table 1 to Subpart II of Part 63 – General Provisions of Applicability to Subpart II lists which parts of the General Provisions in 40 CFR 63.1 – 63.15 apply.

(2) Additional Terms and Conditions

- a. The daily VOC emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- b. No owner or operator shall cause or allow the application of any coating to a ship with an as-applied VOHAP content exceeding the applicable limit given in Table 2 of 40 CFR Part 63, Subpart II, as determined by the procedures described in 40 CFR 63.785(c)(1) through (c)(3).
- c. Each owner or operator shall ensure that:
 - i. all handling and transfer of VOHAP-containing materials to and from containers, tanks, vats, drums, and piping systems is conducted in a manner that minimizes spills; and
 - ii. all containers, tanks, vats, drums, and piping systems are free of cracks, holes and other defects and remain closed unless materials are being added to or removed from them.

c) Operational Restrictions

- (1) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup materials employed;
 - c. the VOC content of each coating and cleanup material employed, in pounds per gallon; and

- d. the total VOC emissions from all the coating and cleanup materials employed, in pounds [i.e., the sum of d)(1)b times d)(1)c for each coating and cleanup material employed].

- (2) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

- (2) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).

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:

VOC emissions from all coating and cleanup materials employed shall not exceed 123.14 pounds per day.

Applicable Emission Limitation:

The daily VOC emission limitation was determined based on the sum of the following:

Determine the daily emissions for the new/refurbished boats and miscellaneous metal parts by multiplying the maximum amount of coating and cleanup material used (gal/day) for each by the maximum VOC content of the coating and cleanup material (lbs/gal) for each.

- b. Emission Limitation:

VOC emissions from all coating and cleanup materials employed shall not exceed 0.52 ton per year.

Applicable Emission Limitation:

The annual VOC emission limitation was determined based on the sum of the following:

Determine the annual emissions for the new/refurbished boats and miscellaneous metal parts by multiplying the maximum amount of coating and



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cleanup material used (gal/year) for each by the maximum VOC content of the coating and cleanup material (lbs/gal) for each, and then dividing by 2000 lbs/ton.

Compliance with this emission limitation shall be based on the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

- (1) None.

3. K003, Building 2 Coating Operations

Operations, Property and/or Equipment Description:

Building 2 Painting Operation - indoor painting of barges equipped with dry filtration system.

Administrative modification to add applicability of the 40 CFR Part 63, Subpart II (Shipbuilding and Repair) MACT due to USEPA Administrative Consent Order.

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

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

a. None.

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

a. None.

b) **Applicable Emissions Limitations and/or Control Requirements**

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	Volatile organic compound (VOC) emissions from all coating and cleanup materials employed shall not exceed 1.68 tons per month average over a 12-month, rolling period.
b.	OAC rule 3745-21-09(U)	This emissions unit is exempt from this rule based on OAC rule 3734-21-09(U)(2)(a) since these are exterior marine vessels.
c.	OAC rule 3745-17-11(C)	See c)(1), c)(2) and d)(2) through d)(6)
d.	40 CFR Part 63, Subpart II (40 CFR 63.780 – 63.789)	See b)(2)a and b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR Part 63.1 – 63.15	Table 1 to Subpart II of Part 63 – General Provisions of Applicability to Subpart II lists which parts of the General Provisions in 40 CFR 63.1 – 63.15 apply.

(2) Additional Terms and Conditions

- a. No owner or operator shall cause or allow the application of any coating to a ship with an as-applied VOHAP content exceeding the applicable limit given in Table 2 of 40 CFR Part 63, Subpart II, as determined by the procedures described in 40 CFR 63.785(c)(1) through (c)(3).
- b. Each owner or operator shall ensure that:
 - i. all handling and transfer of VOHAP-containing materials to and from containers, tanks, vats, drums, and piping systems is conducted in a manner that minimizes spills; and
 - ii. all containers, tanks, vats, drums, and piping systems are free of cracks, holes and other defects and remain closed unless materials are being added to or removed from them.

c) Operational Restrictions

- (1) The permittee shall install and operate a 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) In the event the particulate filter system is not operating in accordance with the manufacturer’s recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- (3) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup materials employed;
 - c. the VOC content of each coating and cleanup material employed, in pounds per gallon;

- d. the total VOC emissions from all the coating and cleanup materials employed, in pounds [i.e., the sum of d)(1)b times d)(1)c for each coating and cleanup material employed]; and
 - e. the total VOC emissions from all the coating and cleanup materials employed, in tons, averaged over a 12 month, rolling period.
- (2) 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 Portsmouth Local Air Agency upon request.
 - (3) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, 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 Portsmouth Local Air Agency upon request.
 - (4) 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.
 - (5) 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 Portsmouth Local Air Agency upon request.
- (6) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Portsmouth Local Air Agency upon request.
 - (7) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (2) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).

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:

VOC emissions from all coating and cleanup materials employed shall not exceed 1.68 tons per month averaged over a 12-month, rolling period.

Applicable Compliance Method:

Compliance shall be determined based on the sum of the coating and cleanup material by multiplying the maximum amount of coating and cleanup material used (gal/year) for each by the maximum VOC content of the coating and cleanup material (lbs/gal) for each, and then dividing by 2000 lbs/ton and dividing by 12 months/year.

Compliance with this emission limitation shall be based on the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

- (1) None.

4. P001, Building 2 Indoor Abrasive Blasting

Operations, Property and/or Equipment Description:

Building 2 indoor abrasive blasting with dust collection system.

Administrative modification to add dust collection system as a Supplemental Environmental Project (SEP) in accordance with USEPA Consent Agreement and Final Order (CAFO).

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

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

a. None.

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

a. None.

b) **Applicable Emissions Limitations and/or Control Requirements**

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	Install a dust collection system with a design control efficiency of at least 99% control of particulate matter (PM) See b)(2)a. and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PM from this air contaminant source since the calculated annual emission rate is less than 10 tons/yr taking into account the voluntary restriction from OAC rule 3745-31-05(E). See b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(E) June 30, 2008	PM emissions shall not exceed 0.13 ton per year. Install a dust collection system with a design control efficiency of at least 99% control of PM.
d.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
e.	OAC rule 3745-17-11(B)	PE shall not exceed 4.17 pounds per hour.

(2) Additional Terms and Conditions

- a. The BAT emission limit applies until U.S.EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S.EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. The dust collection system shall be installed in accordance with the Supplemental Environmental Project (SEP) as required in the US EPA Consent Agreement and Final Order (CAFO) issued August 18, 2015.

c) Operational Restrictions

- (1) The permittee shall not use Black Beauty as a blasting media in this emissions unit or any alternative media that is more toxic than steel shot.
- (2) The permittee shall employ the dust collection system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records that document any time periods when the dust collection system was not in service when the emissions unit was in operation.
- (2) For each day during which the permittee uses an alternative blasting media that is more toxic than steel shot, the permittee shall maintain a record of the type and quantity of blasting media used in this emissions unit.
- (3) The permittee shall perform daily checks, when the emissions unit is in operation and the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in

an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the 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.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when an alternative blasting media is used and/or when the dust collection was not in service when the emissions unit was in operation. Each report shall be submitted within 30 days after the deviation occurs.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term d)(1) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

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:

Install a dust collection system with a design control efficiency of at least 99% control of PM.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

b. Emission Limitation:

PM emissions shall not exceed 0.13 ton per year.

Applicable Compliance Method:

This emission limitation was derived by multiplying the emission factor from STAPPA/ALAPCO "Air Quality Permits", Vol. 1, Section 3 "Abrasive Blasting" (1991 ed) (PM 0.01 lb/lb abrasive) by the maximum annual abrasive used (2,600,000 lbs/year) and by 99% control efficiency for the use of the dust collection system, and dividing by 2000 lbs/ton.

c. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the stack visible particulate emission limitation shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

d. Emission Limitation:

PE shall not exceed 4.17 pounds per hour.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.



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- g) Miscellaneous Requirements
 - (1) None.