



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

12/18/2015

Mr. Gregg Richley
AJAX TOCCO MAGNETHERMIC
1745 Overland Ave. N.E.
Warren, OH 44483

Certified Mail

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1576171949
Permit Number: P0108210
Permit Type: Renewal
County: Stark

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 Canton City Health Department at (330)489-3385 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: Canton



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
AJAX TOCCO MAGNETHERMIC**

Facility ID:	1576171949
Permit Number:	P0108210
Permit Type:	Renewal
Issued:	12/18/2015
Effective:	12/18/2015
Expiration:	12/18/2020



Division of Air Pollution Control
Permit-to-Install and Operate
for
AJAX TOCCO MAGNETHERMIC

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Final Permit-to-Install and Operate
AJAX TOCCO MAGNETHERMIC
Permit Number: P0108210
Facility ID: 1576171949
Effective Date: 12/18/2015

Authorization

Facility ID: 1576171949
Application Number(s): A0041717, A0041948
Permit Number: P0108210
Permit Description: Renewal FEPTIO for three adhesive/paint spray booths.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 12/18/2015
Effective Date: 12/18/2015
Expiration Date: 12/18/2020
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

AJAX TOCCO MAGNETHERMIC
8984 Meridian Circle NW
Canton, OH 44720

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

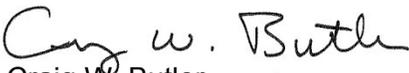
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544
(330)489-3385

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: P0108210

Permit Description: Renewal FEPTIO for three adhesive/paint spray booths.

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

Group Name: Spray Booths

Emissions Unit ID:	K001
Company Equipment ID:	Paint Booth 1A
Superseded Permit Number:	15-01639
General Permit Category andType:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Paint Booth 1C
Superseded Permit Number:	15-01639
General Permit Category andType:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Paint Booth 2C
Superseded Permit Number:	15-01639
General Permit Category andType:	Not Applicable



Final Permit-to-Install and Operate
AJAX TOCCO MAGNETHERMIC
Permit Number: P0108210
Facility ID: 1576171949
Effective Date: 12/18/2015

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
AJAX TOCCO MAGNETHERMIC
Permit Number: P0108210
Facility ID: 1576171949
Effective Date: 12/18/2015

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 Ohio EPA has determined that this facility may be subject to the requirements of 40 CFR Part 63 Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources and/or Subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants for Metal Fabrication and Finishing. At this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



Final Permit-to-Install and Operate
AJAX TOCCO MAGNETHERMIC
Permit Number: P0108210
Facility ID: 1576171949
Effective Date: 12/18/2015

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Spray Booths: K001,K002,K003,

EU ID	Operations, Property and/or Equipment Description
K001	DeVille-Biss paint booth 1A for coating misc. metal parts and rigid fiberglass parts. Equipped with dry filter system.
K002	DeVille-Biss paint booth 1C for coating misc. metal parts and rigid fiberglass parts. Equipped with dry filter system.
K003	DeVille-Biss paint booth 2C for coating misc. metal parts and rigid fiberglass parts. Equipped with dry filter system.

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

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

a. d)(5) - d)(8).

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p><u>For each emissions unit individually:</u></p> <p>Volatile organic compound (VOC) emissions from all VOC containing material employed shall not exceed 12.11 pounds per hour.</p> <p>Visible particulate emissions from any stack shall not exceed 0 percent opacity, as a six-minute average.</p> <p>Particulate emissions (PE) shall not exceed 0.551 pound per hour and 2.41 tons per year.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a., b)(2)b., b)(2)c. and c)(2).
b.	OAC rule 3745-21-09(U)(2)(e)(iii)	The permittee shall not use more than 10 gallons of coating material (paint and adhesive, as applied) per day for the coating of miscellaneous metal parts.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and MACT)	See b)(2)d. and c)(1).
d.	OAC rule 3745-17-07(A)	See b)(2)e.
e.	OAC rule 3745-17-11(C)	See b)(2)f.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements for these emissions units have been determined to be the use of a dry filter system for overspray control. BAT requirements also include compliance with the terms and conditions of this permit.
- b. All PE is assumed to be less than 10 microns in diameter (PM₁₀).
- c. The hourly emissions limit was established to reflect the potential to emit for these emissions units. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.
- d. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 12.1 tons per rolling, 12-month period for VOC emissions from each emissions unit individually; and
 - ii. 9.90 tons per rolling, 12-month period for any individual hazardous air pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units K001 through K003, combined.
- e. These emissions units are not subject to the requirements of OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h).
- f. These emissions units are not subject to the requirements of OAC rule 3745-17-11(C) pursuant to OAC rule 3745-17-11(C)(3).

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of all VOC containing materials employed in emissions unit K001, K002 and K003, individually, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(U_i)(C_i) \left(\frac{1 \text{ ton}}{2000 \text{ lbs}} \right)] \leq 12.1$$

Where:

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

n = the total number of VOC containing material employed during the period;

U_i = total amount of the individual VOC containing material employed, in gallons.

C_i = VOC content for the individual VOC containing material employed, in pounds per gallon

- (2) The permittee shall operate the dry filtration system for control of particulate emissions in accordance with the manufacturer's recommendations whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when its associated emissions unit was in operation.
- (2) The permittee shall maintain daily records of the coating material usage in these emissions units, individually, in gallons.
- (3) The permittee shall collect and record the following information each month for all VOC containing material employed in emissions units K001, K002 and K003, individually:
 - a. the name and identification number of each VOC containing material employed;
 - b. the VOC content of each VOC containing material, in pounds per gallon, as applied;
 - c. the amount of each individual HAP⁽¹⁾ in each VOC containing material, in pounds per gallon, as applied;
 - d. the number of gallons of each VOC containing material employed;
 - e. the total VOC emissions for all VOC containing material [summation of d)(3)b. x d)(3)d. for each VOC containing material], in pounds;
 - f. the annual VOC emissions, in tons, from all VOC containing materials, based upon a rolling, 12-month summation of the monthly VOC emissions; and
 - g. the emission rate for each individual HAP from each VOC containing material employed [d)(3)c. x d)(3)d.], in pounds per month.

⁽¹⁾ A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting Canton City Health Department, Air Pollution Control Division.

Also, Material Safety Data Sheets typically include a listing of the HAPs contained in the coatings and cleanup materials.

- (4) The permittee shall collect and record the following HAP information each month for emissions units K001, K002 and K003, combined:
- a. the total emission rate for each individual HAP from all the materials employed in these emissions units, in pounds per month [summation of the individual HAPs quantified in d)(3)h.];
 - b. the total HAP emission rate for all HAPs combined from all the materials employed in these emissions units [summation of all individual HAPs quantified in d)(4)a.], in tons per month; and
 - c. the annual emissions of each individual HAP and all HAPs combined, based upon rolling, 12-month summations of the monthly HAP emission rates.
- (5) The permit to install for emissions units K001, K002, and K003 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant	Maximum emission rate per spray booth	TLV, ug/m3	MAGLC (TLV/42), ug/m3	Predicted 1-hour maximum ground level concentration, ug/m3, K001, K002, K003 combined
Toluene	7.2 lb/hr 0.91 g/sec	75,362	1794	451 ug/m3
Xylene	3.7lb/hr 0.47 g/sec	343,000	8,167	233 ug/m3
Ethyl Benzene	1.1 lb/hr 0.14 g/sec	434,000	10,333	70 ug/m3

- (6) Physical changes to or changes in the method of operation of any of the emissions units after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to any of the emissions units or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (7) If the permittee determines that the "Air Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.
- (8) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

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

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month emission limitation for VOC emissions;
 - ii. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the coatings, thinners, additives, and cleanup materials employed;
 - iii. all exceedances of the rolling, 12-month total combined HAPs emission limitation for all the coatings, thinners, additives, and cleanup materials employed; and
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

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

- (2) The permittee shall notify the Director (Canton City Health Department, Air Pollution Control Division) in writing of any daily record showing that the total combined usage of coating material (paint and adhesive, as applied), for any of the emissions units exceeds 10 gal/day. The notification shall include a copy of such record and shall be sent to the Director (Canton City Health Department, Air Pollution Control Division) within 45 days after the exceedance occurs.
- (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA

fulfills the requirement to submit the required information to the Director or Canton City Health Department, Air Pollution Control Division, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

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

a. Emissions Limitation:

12.1 tons per rolling, 12-month period for VOC emissions from each emissions unit individually

Applicable Compliance Method:

Compliance shall be demonstrated by the recordkeeping requirements specified in d)(3).

b. Emissions Limitation:

9.90 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units K001 through K003, combined

Applicable Compliance Method:

Compliance shall be demonstrated by the recordkeeping requirements specified in d)(4).

c. Emissions Limitation:

The permittee shall not use more than 10 gallons of coating material (paint and adhesive, as applied) per day for the coating of miscellaneous metal parts.

Applicable Compliance Method:

Compliance shall be demonstrated by the recordkeeping requirements specified in d)(2).

d. Emissions Limitation:

VOC emissions shall not exceed 12.11 lb/hr

Applicable Compliance Method:

The hourly VOC emission limitation represents the potential to emit* for this emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit was established by multiplying the maximum hourly paint usage of 1 gal/hr by the maximum VOC content of 4.9 lb VOC /gal paint plus the maximum hourly adhesive usage of 1 gal/hr multiplied by the maximum VOC content of 0.01 lb VOC /gal adhesive plus the maximum hourly toluene usage of 1 gal/hr by the maximum VOC content of 7.2 lb VOC /gal toluene.

e. Emissions Limitation:

Visible particulate emissions from any stack shall not exceed 0 percent opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

f. Emissions Limitation:

PE shall not exceed 0.551 lb/hr and 2.41 tpy

Applicable Compliance Method:

To determine the worst case particulate emissions rate (PE) in lbs/hr, the following equation shall be used:

$$PE = S \times (1-TE) \times (1-CE), \text{where}$$

S = maximum coating solids usage rate, in pounds per hour,

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.25);

CE = fractional control efficiency of the control equipment (0.99).

If required, compliance with the hourly emissions limitation shall be determined in accordance with the test methods and procedures in Methods 1 - 5 of 40 CFR Part 60, Appendix A.

The annual limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore compliance is demonstrated with the hourly emission limitation compliance with the annual emission limitation shall also be demonstrated.



Final Permit-to-Install and Operate
AJAX TOCCO MAGNETHERMIC
Permit Number: P0108210
Facility ID: 1576171949
Effective Date: 12/18/2015

g) Miscellaneous Requirements

- (1) None.