Ohio Environmental Protection Agency

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

Certified Mail

1/7/2016

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

Nick Pamboukis
Heritage Industrial Finishing
1874 Englewood Avenue
Akron, OH 44312

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1677011297
Permit Number: P0119618
Permit Type: Initial Installation
County: Summit

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 Akron Regional Air Quality Management District at (330)375-2480or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

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

Cc: ARAQMD

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Heritage Industrial Finishing

Facility ID:	1677011297
Permit Number:	P0119618
Permit Type:	Initial Installation
Issued:	1/7/2016
Effective:	1/7/2016
Expiration:	1/7/2021

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Heritage Industrial Finishing

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Authorization

Facility ID:	1677011297
Application Number(s):	A0052497, A0054375
Permit Number:	P0119618
Permit Description:	Initial installation permit for a metal coating facility requesting federally-enforceable operating limits to reduce VOC and HAP emissions to avoid Title V requirements.
Permit Type:	Initial Installation
Permit Fee:	$1,600.00
Issue Date:	1/7/2016
Effective Date:	1/7/2016
Expiration Date:	1/7/2021

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Heritage Industrial Finishing
171 Kelly Avenue
Akron, OH 44306

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0119618
Permit Description: Initial installation permit for a metal coating facility requesting federally-enforceable operating limits to reduce VOC and HAP emissions to avoid Title V requirements.

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

Group Name: Conveyor Lines

Emissions Unit ID:	**K001**
Company Equipment ID:	Coating Line #1
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Coating Line #2
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

Group Name: Three gallon per day units

Emissions Unit ID:	**K003**
Company Equipment ID:	Walk-In Booth
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K004**
Company Equipment ID:	Front Warehouse Booth
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K005**
Company Equipment ID:	Rear Warehouse Booth
Superseded Permit Number:	
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 [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 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) 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) 2, 3, 4, 5, and 6.

2. Heritage Industrial Finishing, Inc. has requested the following limit to volatile organic compound (VOC) emissions to avoid Title V permitting and non-attainment New Source Review, as well as limits to hazardous air pollutants (HAPs) to avoid being subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63 subpart MMMM) for all emissions units combined.

   a) Emissions of an individual HAP shall not exceed 9.5 tons per year, based upon a rolling, 12-month summation of monthly emissions.

   b) Emissions of all HAPs shall not exceed 24.5 tons per year, based upon a rolling, 12-month summation of monthly emissions.

   c) Emissions of VOCs shall not exceed 95 tons per year, based upon a rolling, 12-month summation of monthly emissions.

3. In order to determine compliance with the emission limitations in 2 above, the permittee shall maintain monthly records of the following information:

   a) For all emissions units:

      (1) A unique name or identification number for each coating, thinning solvent, and cleanup solvent used;

      (2) The individual HAP content for each HAP of each coating, thinning solvent, and cleanup solvent used, in pounds per gallon;

      (3) The VOC content of each coating, thinning solvent, and cleanup solvent used, in pounds per gallon;

      (4) The total volume of each coating, thinning solvent, and cleanup solvent used in gallons;

   b) Each month the permittee shall calculate and record the following values for the previous month as well as the summation of the values for the previous 12-month period for all emissions units. Any credible method for performing these calculations is acceptable so long as the permittee retains records showing how they were completed.

(1) The calculated individual HAP emissions in tons for the prior month*.

(2) The sum of the individual HAP emissions for the last 12-month period.

(3) The calculated actual combined HAP emissions in tons for the prior month*.

(4) The sum of the combined HAP emissions for the last 12-month period.

(5) The calculated actual VOC emissions in tons for the prior month.

(6) The sum of the VOC emissions for the last 12-month period.

* Volatile HAPs shall be assumed to be fully emitted; Metal HAPs emissions shall be calculated by the equation below:

$$E_M = (1 - T)(1 - F)W_M \mathrm{V} = 0.008 W_M V,$$

where E_M is the metal HAPs emissions in pounds, W_M is the metal HAP content of the coating in pounds per gallon, T is the transfer efficiency (0.6 for this application), and F is the filter efficiency (0.98 for this application), and V is the volume of coating used.

4. The permittee shall submit quarterly deviation (excursion) reports for the following emissions unit(s) 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:

Emissions unit ID	Term & Condition
Facility-Wide	Emissions of an individual HAP shall not exceed 9.5 tons per year, based upon a rolling, 12-month summation of monthly emissions.
Facility-Wide	Emissions of all HAPs shall not exceed 24.5 tons per year, based upon a rolling, 12-month summation of monthly emissions.
Facility-Wide	Emissions of VOCs shall not exceed 95 tons per year, based upon a rolling, 12-month summation of monthly emissions.
K001	Coating usage shall not exceed 4,650 gallons per month.
K002	Coating usage shall not exceed 2,325 gallons per month.
K003, K004, K005	Coating usage shall not exceed 3 gallons per day.

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).

5. Compliance with the emission limitations in 2 above shall be determined in accordance with the following methods:

a) Emission Limitations:

The emissions of any individual HAP from all emissions units combined, shall not exceed 9.5 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of combined HAPs from emissions units combined, shall not exceed 24.5 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of VOC from emissions units combined, shall not exceed 95 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual emission limitations above shall be demonstrated through the record keeping requirements established in 3.a) and 3.b) above.

When required, formulation data or USEPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings. Formulation data shall be used to determine the HAP contents of the coatings and solvents.

6. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart HHHHHHH, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. At this time the Ohio EPA is not accepting the delegating authority to enforce NESHAP standards for area sources. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website http://www.ecfr.gov/ or by contacting the appropriate Ohio EPA District Office or Local Air Agency.

7. 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.

8. 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.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Conveyor Lines: K001, K002

EU ID	Operations, Property and/or Equipment Description
K001	Conveyorized coating line containing two prime booths, two IR ovens, two topcoat booths, a natural gas-fired convection oven, and a load off/on station.
K002	Conveyorized coating line containing one prime booth, one topcoat booth, a natural gas-fired, double pass convection oven, and a load off/on station.

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. All.

b) Applicable Emission 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 emission 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 Emission Limitations/Control Measures
a.	OAC 3745-31-05 (A)(3)	Volatile organic compound (VOC) emissions shall not exceed 8.0 tons per month averaged over a 12-month rolling period for unit K001 and 4.0 tons per month averaged over a 12-month rolling period for unit K002. See b)(2)a. and c)(9) below.
b.	OAC 3745-31-05(D) (Synthetic Minor to avoid Title V permitting)	See Facility-Wide Terms and Conditions B.2, B.3, B.4, B.5, and B.6 above.
c.	OAC 3745-21-09 (U)(1)(d)	See b)(2)b. and b)(2)c. below.

	Applicable Rules/Requirements	Applicable Emission Limitations/Control Measures
d.	OAC 3745-21-26 (C)(1) Compliance required by 10/15/2016	See b)(2)b., b)(2)d., c)(3), c)(4), c)(5), c)(6), c)(7), and c)(8) below.
e.	OAC 3745-17-11(C)	Each surface coating process emission unit shall be controlled by a dry particulate filtration system.

(2) Additional Terms and Conditions

a. The VOC monthly emission limitations were established to reflect the uncontrolled potential to emit for the emissions units listed above. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these emission limitations.

b. The VOC content limit imposed in OAC 3745-21-09(U)(1)(d) applies until U.S. EPA approves OAC 3745-21-26 into the Ohio State Implementation Plan (SIP).

c. VOC content of coatings shall not exceed 3.5 pounds VOC per gallon excluding water and exempt compounds, as applied, for any coating that is dried at temperatures not exceeding 200 degrees Fahrenheit.

d. VOC content of coatings shall not exceed:

i. 3.5 pounds VOC per gallon excluding water and exempt compounds, as applied, when air dried or baked for camouflage metal coatings as defined in OAC 3745-21-01,

ii. 2.8 pounds VOC per gallon excluding water and exempt compounds, as applied, when air dried for military spec and general metal coatings as defined in OAC 3745-21-01, and

iii. 2.3 pounds VOC per gallon excluding water and exempt compounds, as applied, when baked for military spec and general metal coatings as defined in OAC 3745-21-01.

Additional coating types as defined in OAC 3745-21-01 should be compared to OAC 3745-21-26(C)(1) tables 1-5 to identify applicable VOC content limits for an uncontrolled emission unit.

c) Operational Restrictions

(1) The permittee shall operate the dry particulate filtration system for the control of particulate emissions whenever an emissions unit listed above is in operation and shall maintain the dry particulate filters 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 dry particulate filtration system(s) is/are not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

(3) One, or a combination, of the following application methods shall be used for coating application

a. Electrostatic equipment.

b. High volume low pressure (HVLP) spray equipment.

c. Flow coating.

d. Roller coating.

e. Dip coating, including electrodeposition.

f. Airless spray.

g. Air-assisted airless spray.

h. Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying.

(4) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(5) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

(6) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(7) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one location to another in closed containers or pipes.

(8) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

(9) Coating usage shall not exceed 4,650 gallons per month for unit K001 and 2,325 gallons per month for unit K002.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee must collect and record the following information for the miscellaneous metal parts coating lines to demonstrate compliance with the coating VOC content limitations by means of use of complying coatings (i.e., each coating used complies with the applicable emission limitation, as applied)

a. The name, identification number, and type (for example, camouflage coating as defined in OAC 3745-21-01) of each coating applied and each cleaning material employed; and

b. the mass of VOC per volume of each coating, in pounds per gallon, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$

Where:

D_C = the density of coating, in pounds of coating per gallon of coating;

$W_{VOC} = W_{VM} - W_W - W_{ES}$;

V_S = volume fraction of solids in coating, in gallons of solids per gallon of coating;

$V_{VOC} = V_{VM} - V_W - V_{ES}$;

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating;

W_W = weight fraction of water in coating, in pound of water per pound of coating;

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating;

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating;

V_W = volume fraction of water in coating, in gallon of water per gallon of coating; and

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

If the permittee mixes compliant coatings, it is not necessary to record the VOC content of the resulting mixture.

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

(3) The permittee shall conduct periodic inspections of the dry particulate filtration systems 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.

(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 filters while the emissions units are 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 filtration systems and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

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

(6) The permittee shall maintain records that document any time periods when the dry particulate filtration system 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 filtration system 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.

(7) The permittee shall collect and record the following information on a monthly basis for the coating materials applied in each of these emissions units:

a. A unique name or identification number for each coating employed in the coating line during the month;

b. The total volume, in gallons, of each coating employed in the coating line during the month;

c. The total volume, in gallons, of all coatings employed in the coating line during the month.

e) Reporting Requirements

(1) The permittee shall notify the Ohio EPA district office or local air agency in writing of any daily record showing use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the appropriate Ohio EPA district office or local air agency within 30 days after the exceedance occurs for the compliant coating option.

(2) 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.

(3) 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.

f) Testing Requirements

(1) Compliance with the Emission 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 Limitations:</u>

Volatile organic compound (VOC) emissions shall not exceed 8.0 tons per month averaged over a 12-month rolling period for emissions unit K001 and 4.0 tons per month averaged over a 12-month rolling period for emissions unit K002.

<u>Applicable Compliance Method</u>:

Compliance with the monthly allowable VOC emission limitations above shall be demonstrated by the following equations:

$$P = VC,$$

where P is the potential to emit, V is the maximum coating volume usage rate, and C is the maximum allowable coating VOC content.

For emissions unit K001,

$$P_{K001} = V_{K001}C_{K001} = \left(150\,\frac{gal}{day} \times \frac{365\,day}{yr} \times \frac{1\,yr}{12\,mo}\right)\left(3.5\,\frac{lb\,VOC}{gal} \times \frac{0.005\,ton}{lb}\right) = 8.0\,\frac{tons}{month}.$$

For emissions unit K002,

$$P_{K002} = V_{K002}C_{K002} = \left(75\,\frac{gal}{day} \times \frac{365\,day}{yr} \times \frac{1\,yr}{12\,mo}\right)\left(3.5\,\frac{lb\,VOC}{gal} \times \frac{0.005\,ton}{lb}\right) = 4.0\,\frac{tons}{month}.$$

b. Emission Limitation:

VOC content of coatings shall not exceed 3.5 pounds VOC per gallon excluding water and exempt compounds, as applied, for any coating that is dried at temperatures not exceeding 200 degrees Fahrenheit.

Applicable Compliance Method:

Compliance with the allowable VOC content limitations above shall be shall be demonstrated through the record keeping requirements established in d)(1) above.

c. Emission Limitation:

VOC content of coatings shall not exceed:

i. 3.5 pounds VOC per gallon excluding water and exempt compounds, as applied, when air dried or baked for camouflage metal coatings as defined in OAC 3745-21-01,

ii. 2.8 pounds VOC per gallon excluding water and exempt compounds, as applied, when air dried for military spec and general metal coatings as defined in OAC 3745-21-01, and

iii. 2.3 pounds VOC per gallon excluding water and exempt compounds, as applied, when baked for military spec and general metal coatings as defined in OAC 3745-21-01.

Additional coating types as defined in OAC 3745-21-01 should be compared to OAC 3745-21-26(C)(1) tables 1-5 to identify applicable VOC content limits for an uncontrolled emission unit.

Applicable Compliance Method:

Compliance with the allowable VOC content limitations above shall be shall be demonstrated through the record keeping requirements established in d)(1) above.

d. Operational Restriction:

Coating usage shall not exceed 4,650 gallons per month for unit K001 and 2,325 gallons per month for unit K002.

Applicable Compliance Method:

Compliance with the allowable VOC content limitations above shall be shall be demonstrated through the record keeping requirements established in d)(7) above.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group -Three gallons per day units: K003, K004, K005

EU ID	Operations, Property and/or Equipment Description
K003	Viking 12' x 16' coating booth.
K004	Open warehouse space for coating large equipment vented with a filtered exhaust fan.
K005	Open warehouse space for coating large equipment vented with a filtered exhaust fan.

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)b., b)(1)f., b)(2)e., d)(2), d)(3), d)(4), d)(5), and 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. All except b)(1)b., b)(1)f., b)(2)e., d)(2), d)(3), d)(4), d)(5), and e)(2).

b) Applicable Emission 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 emission 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 Emission Limitations/Control Measures
a.	OAC 3745-31-05(A)(3) June 30, 2008	Volatile organic compound (VOC) emissions for each unit shall not exceed 0.4 ton per month averaged over a 12-month rolling period. See b)(2)a., b)(2)b., b)(2)c., and b)(2)d. below.
b.	OAC 3745-31-05(A)(3)(a)(ii) June 30, 2008	The BAT requirements under OAC 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the potential to emit is less than 10 tons per year for each unit. See b)(2)e. below.

	Applicable Rules/Requirements	Applicable Emission Limitations/Control Measures
c.	OAC 3745-31-05(D) (Synthetic Minor to avoid Title V permitting)	See Facility-Wide Terms and Conditions B.2, B.3, B.4, B.5, and B.6 above.
d.	OAC 3745-21-09(U)(2)(e)(ii)	See b)(2)f. and c)(1) below.
e.	OAC 3745-21-26(A)(3)(f)(i) Compliance required by 10/15/2016	See b)(2)f. and c)(1) below.
f.	OAC 3745-114-01 ORC rule 3704.03(F)	See d)(2), d)(3), d)(4), d)(5), and e)(4) below.
g.	OAC 3745-17-11(C)	Exempt per OAC 3745-17-11(A)(1)(i)

(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, these emission limitations/control measures no longer apply.

b. The VOC monthly emission limitations were established to reflect the uncontrolled potential to emit for the emissions units listed above. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these emission limitations.

c. The permittee shall operate the dry filtration systems for the control of particulate emissions whenever these emissions units are in operation and shall maintain the dry particulate filters in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

d. In the event the particulate filter systems are not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be

expeditiously repaired or otherwise returned to these documented operating conditions.

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

f. The coating usage limit imposed in OAC 3745-21-09(U)(2)(e)(ii) applies until U.S. EPA approves OAC 3745-21-26 as part of the Ohio State Implementation Plan (SIP).

c) Operational Restrictions

(1) The permittee shall not employ more than three gallons of coating per day for each of the following miscellaneous metal parts and products coating lines: K003, K004, K005. The daily usage limitation shall not include coatings applied to parts or products which are not metal.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information on a daily basis for the coating materials applied in each of these emissions units:

a. A unique name or identification number for each coating employed in the coating line;

b. The total volume, in gallons, of each coating employed in the coating line.

c. The total volume, in gallons, of all coatings employed in the coating line.

(2) The federally enforceable permit to install and operate (FEPTIO) application for emissions units K003, K004, and K005 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 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 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 was divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard 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):

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

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):

Toxic Contaminant: xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 1

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 140.8

MAGLC (µg/m3): 10338

The permittee, has demonstrated that emissions of xylene, from emissions units K003, K004, and K005 together, was 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).

(3) Prior to making any physical changes to or changes in the method of operation of the emissions units, 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 units or 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.

(4) 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.

(5) 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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

(2) The permittee shall identify in the annual Permit Evaluation Report (PER) report the following information during the 12-month reporting period for these emissions units:

a. 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. 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 Emission 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>

Volatile organic compound (VOC) emissions shall not exceed 0.4 tons per month averaged over a 12-month rolling period for each unit.

<u>Applicable Compliance Method</u>:

Compliance with the monthly allowable VOC emission limitations above shall be demonstrated by the following equations:

$$P = VC,$$

where P is the potential to emit, V is the maximum coating volume usage rate, and C is the maximum allowable coating VOC content.

For emissions units K003, K004, and K005

$$P = VC = \left(3\frac{gal}{day} \times \frac{365\ day}{yr} \times \frac{1\ yr}{12\ mo}\right)\left(6.68\frac{lb\ VOC}{gal} \times \frac{0.005\ ton}{lb}\right) = 0.4\frac{tons}{mo}$$

b. <u>Emission Limitation:</u>

The permittee shall not employ more than three gallons of coating per day for each miscellaneous metal parts and products coating line. The daily usage limitation shall not include coatings applied to parts or products which are not metal.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.