



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

1/28/2016

Michael McKay
 Furukawa Rock Drill USA, Inc.
 705 Lake Street
 Kent, OH 44240

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

Facility ID: 1667040039
 Permit Number: P0119322
 Permit Type: Renewal
 County: Portage

Certified Mail

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

Dear Permit Holder:

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

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

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

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

Sincerely,

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

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



Permit Strategy Write-Up

1. Check all that apply:

[X] Synthetic Minor Determination

[] Netting Determination

2. Source Description: Furukawa Rock Drill USA, Inc. (FRD), formerly Gougler Industries, Inc., located in Kent, Ohio, operates a paint spray booth (K001) for coating miscellaneous metal parts.

3. Facility Emissions and Attainment Status: Materials used in the facility's coating process contain ingredients which are listed as hazardous air pollutants (HAPs) under Section 112(b) of the Clean Air Act. Other air contaminants emitted from emissions unit K001 are particulate matter (PM) and volatile organic compounds (VOC). FRD has a potential to emit that is above Title V permitting thresholds for individual and combined hazardous air pollutants (HAPs). This facility is located in Portage County which is currently in attainment for all criteria pollutants except ozone, which is designated as marginal nonattainment.

4. Source Emissions: Paint spray booth K001 is the only emissions unit at the facility. The permittee has agreed to material usage restrictions of not more than 3 gallons of coating per day for miscellaneous metal parts and not more than 5 gallons per day for total coating operations. To avoid Title V permitting, HAP emissions for this source are limited to 7.1 tons of individual HAP per rolling, 12-month period and 11.1 tons of combined HAPs per rolling, 12-month period.

5. Conclusion: Compliance with the material usage restrictions and HAP emission limitations, in accordance with the associated monitoring, record keeping and reporting requirements, will ensure this facility remains a synthetic minor source, through OAC rule 3745-31-05(D), with respect to HAP emissions. Issuance of P0119322 is recommended.

6. Please provide additional notes or comments as necessary: None.

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

Table with 2 columns: Pollutant, Tons Per Year. Rows include VOC (28.5), Individual HAP (7.1), and Combined HAPs (11.1).

PUBLIC NOTICE

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

Draft Air Pollution Permit-to-Install and Operate Renewal

Furukawa Rock Drill USA, Inc.

705 LAKE ST., Kent, OH 44240

ID#:P0119322

Date of Action: 1/28/2016

Permit Desc:FEPTIO Renewal permit for rock drill equipment metal coating..

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



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Furukawa Rock Drill USA, Inc.**

Facility ID:	1667040039
Permit Number:	P0119322
Permit Type:	Renewal
Issued:	1/28/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Furukawa Rock Drill USA, Inc.

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Draft Permit-to-Install and Operate

Furukawa Rock Drill USA, Inc.

Permit Number: P0119322

Facility ID: 1667040039

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1667040039
Application Number(s): A0053978
Permit Number: P0119322
Permit Description: FEPTIO Renewal permit for rock drill equipment metal coating.
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 1/28/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Furukawa Rock Drill USA, Inc.
705 LAKE ST
Kent, OH 44240

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



Draft Permit-to-Install and Operate

Furukawa Rock Drill USA, Inc.

Permit Number: P0119322

Facility ID: 1667040039

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0119322

Permit Description: FEPTIO Renewal permit for rock drill equipment metal coating.

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

Emissions Unit ID:	K001
Company Equipment ID:	Paint Booth
Superseded Permit Number:	P0106919
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
Furukawa Rock Drill USA, Inc.
Permit Number: P0119322
Facility ID: 1667040039
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



Draft Permit-to-Install and Operate
Furukawa Rock Drill USA, Inc.
Permit Number: P0119322
Facility ID: 1667040039
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install and Operate

Furukawa Rock Drill USA, Inc.

Permit Number: P0119322

Facility ID: 1667040039

Effective Date: To be entered upon final issuance

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.



Draft Permit-to-Install and Operate
Furukawa Rock Drill USA, Inc.
Permit Number: P0119322
Facility ID: 1667040039
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. K001, Paint Booth

Operations, Property and/or Equipment Description:

Paint Booth - coating of miscellaneous metal parts

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

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

a. None.

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

a. b)(1)d.

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) (PTI 16-1567, issued 8/21/1996)	Volatile organic compound (VOC) emissions shall not exceed 156.0 pounds per day.
b.	OAC rule 3745-31-05(D)	Annual emissions shall not exceed the following, as a rolling 12-month summation: 7.1 tons per year of any individual hazardous air pollutant (HAP); and 11.1 tons per year of total combined HAPs. See b)(2)b, c)(1), and c)(2) below.
c.	OAC rule 3745-21-09(U)	See b)(2)a. and c)(1) below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-21-26(C) and (D)	Exempt per OAC rule 3745-21-26(A)(3)(f)(i). See c)(1) below.
e.	OAC rule 3745-21-26(E) and (H)	See b)(2)c. and c)(3) below.
f.	OAC rule 3745-17-07(A)	Exempt per 3745-17-07(A)(3)(h).
g.	OAC rule 3745-17-11(C)	Exempt per 3745-17-11(A)(1)(i). See c)(2) below.

(2) Additional Terms and Conditions

- a. 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).
- b. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.
- c. The permittee shall comply with the applicable requirements of this rule no later than 10/15/2016.

c) Operational Restrictions

- (1) The permittee shall not employ more than 3 gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.
- (2) The maximum daily coating usage shall not exceed 5 gallons.
- (3) The following work practices shall be used to minimize VOC emissions from mixing operations, storage tanks and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials:
 - a. Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
 - b. 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.
 - c. Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
 - d. Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one location to another in closed containers or pipes.

- e. Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall collect and record the following information each day for the coatings and cleanup materials applied to miscellaneous metal parts:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the VOC content of each coating, as applied, in pounds per gallon;
 - c. the VOC content of each cleanup material, in pounds per gallon;
 - d. the number of gallons of each coating employed;
 - e. the total number of gallons of all coatings employed;
 - f. the total number of gallons of each cleanup material employed; and
 - g. the total VOC emission rate from all coatings and cleanup materials employed, in pounds per day.
 - (2) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP) that are applied in the emissions unit:
 - a. the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;
 - b. the name/identification of each individual HAP contained in each material applied (and identified in "a" above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;
 - c. the number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;
 - d. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of "b" times "c" for all the materials applied during the month, divided by 2,000 pounds;
 - e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from "d" above;
 - f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in "d" above, for the present month plus the previous 11 months of operation, in ton(s); and

- g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in "e" above, for the present month plus the previous 11 months of operation, in ton(s).

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

e) Reporting Requirements

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall 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.
- (4) 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. an identification of each day in which the coating usage exceeded the daily limitations contained in this permit; and
 - ii. an identification of each month in which the accumulative, rolling, 12-month emissions limitation(s) for any individual HAP or combined HAPs



exceeded the limitations in this permit, in tons per rolling, 12-month period;

- 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 (the appropriate District Office or local air agency).

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 156.0 pounds per day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(1).

b. Emission Limitation:

7.1 tons per year of any individual HAP; and

11.1 tons per year of total combined HAPs.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(2).

c. Emission Limitation:

The permittee shall not employ more than 3 gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.



Draft Permit-to-Install and Operate

Furukawa Rock Drill USA, Inc.

Permit Number: P0119322

Facility ID: 1667040039

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(1).

d. Emission Limitation:

The maximum daily coating usage shall not exceed 5 gallons.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(1).

- (2) USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

g) Miscellaneous Requirements

- (1) None.