



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

3/7/2016

Certified Mail

Rob Coey
 SEW EURODRIVE
 2001 W. Main Street
 Troy, OH 45373

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

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

Facility ID: 0855140421
 Permit Number: P0120016
 Permit Type: OAC Chapter 3745-31 Modification
 County: Miami

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, Troy Daily News. 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 and Regional Air Pollution Control Agency
 Permit Review/Development Section 117 South Main Street
 Ohio EPA, DAPC Dayton, OH 45422-1280
 50 West Town Street Suite 700
 PO Box 1049
 Columbus, Ohio 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
 RAPCA; Indiana

Permit Strategy Write-Up

1. Check all that apply:

 X Synthetic Minor Determination

Netting Determination

2. Source Description: SEW Eurodrive, 0855140421 is an assembler and distributor of industrial transmissions. SEW operates two miscellaneous metal parts coating lines with Ohio EPA emissions unit identification numbers K001 and K006. This permit is being issued for K001 only; emissions unit K006 is being issued in PTIO P0120017. Emission Unit K001 is an existing miscellaneous metal parts coating booth with natural gas fired drying oven and passive paint booth filter. Emissions unit K001 underwent modifications beginning in January 2014 to replace the booth and small conveyor with a larger more efficient booth, mixing kitchen, and larger conveyor. With these changes the maximum coating usage rate for the booth increased from 3 gals/hr (as permitted in PTIO P0092400) to 6.4 gals/hr. This permit is being processed as a Chapter 31 modification due to a change in the method of operation that caused an increase in allowable emissions.
3. Facility Emissions and Attainment Status: SEW is located in Miami County which is currently in attainment with all NAAQS. The facility wide PTE calculations included VOC, single HAP and combined HAP calculations. The PTE calculations were based on their maximum hourly coating usage rate multiplied by OAC rule 3745-21-09, maximum VOC content of 3.5 lbs VOC/gallon of coating, as applied, excluding water and exempt solvents. Potential emissions are included in Table 1 below. As part of this application, SEW requested voluntary federally enforceable restrictions which will maintain their single HAP emissions, combined total HAP emissions and VOC emissions below major source thresholds to avoid Title V and MACT applicability.
4. Source Emissions: SEW will operate under a facility wide synthetic minor limitation for HAPs and federally enforceable emissions limitations to limit the VOC PTE from K001 and K006 combined to below the major source threshold. The Table 1 below shows emissions before and after voluntary federally enforceable limitations.

Table 1: Emissions Calculations

Emissions Unit	Potential Annual Emissions			Emissions After Restrictions		
	VOC (tons)	Individual HAP (tons)	Combined HAPs (tons)	VOC (tons)	Individual HAP (tons)	Combined HAPs (tons)
K001	98.11	11.93	15.51	9.49	1.06	1.38
K006	98.11	11.93	15.51		1.06	1.38
Total	196.22	23.86	31.02	9.49	2.12	2.76

5. Conclusion: This permit contains federally enforceable requirements to ensure the HAP and VOC emissions for the facility are maintained below MACT and Title V applicability thresholds. The permit specifies a federally enforceable operational restriction of 5,000 gallons on the coating usage from emissions units K001 and K006 that limits the emissions from emissions units K001 and K006. Monthly monitoring, record keeping and annual reporting will be required to monitor compliance.

6. Please provide additional notes or comments as necessary:

None.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	9.49
Individual HAP	9.9
Combined HAPs	24.9

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 OAC Chapter 3745-31 Modification
SEW EURODRIVE

2001 WEST MAIN ST., Troy, OH 45373

ID#:P0120016

Date of Action: 3/7/2016

Permit Desc: Chapter 31 modification permit for emissions unit K001 (miscellaneous metal parts coating booth) due to upgrading the booth, conveyor and dehumidifying oven..

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: Andrew Weisman, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280. Ph: (937)225-4435



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
SEW EURODRIVE**

Facility ID:	0855140421
Permit Number:	P0120016
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	3/7/2016
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
SEW EURODRIVE

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Draft Permit-to-Install and Operate
SEW EURODRIVE

Permit Number: P0120016

Facility ID: 0855140421

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0855140421
Application Number(s): A0054959
Permit Number: P0120016
Permit Description: Chapter 31 modification permit for emissions unit K001 (miscellaneous metal parts coating booth) due to upgrading the booth, conveyor and dehumidifying oven.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$400.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 3/7/2016
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:

SEW EURODRIVE
2001 WEST MAIN ST.
Troy, OH 45373

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:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

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
SEW EURODRIVE

Permit Number: P0120016

Facility ID: 0855140421

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0120016

Permit Description: Chapter 31 modification permit for emissions unit K001 (miscellaneous metal parts coating booth) due to upgrading the booth, conveyor and dehumidifying oven.

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 Spray Booth #1
Superseded Permit Number:	P0092400
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
SEW EURODRIVE
Permit Number: P0120016
Facility ID: 0855140421
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 Regional Air Pollution Control Agency 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
SEW EURODRIVE
Permit Number: P0120016
Facility ID: 0855140421
Effective Date: To be entered upon final issuance

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, and 5.
2. SEW Eurodrive has requested the following Federally Enforceable limitations to volatile organic compound (VOC) emissions to avoid Title V permitting, 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 M) for all emission units combined..
 - a) Emissions of VOCs from emissions units K001 and K006, combined, shall not exceed 9.49 tons per year (TPY), including cleanup, based upon a rolling, 12-month summation of monthly emissions.
 - b) The maximum annual coating usage for emissions unit K001 and K006, combined, shall not exceed 5,000 gallons, based upon a rolling, 12-month summation of the monthly coating usages.
 - c) Facility wide emissions of an individual HAP shall not exceed 9.9, based upon a rolling, 12-month summation of the monthly emissions.
 - d) Facility wide emissions of any combination of HAPs shall not exceed 24.9 TPY, based upon a rolling, 12-month summation of the monthly emissions.
3. In order to determine compliance with the emission limitations in B.2. above, the permittee shall maintain monthly records of the following information:
 - a) For each coating, thinning solvent, and cleanup solvent applied:
 - (1) A name or identification number for each material applied;
 - (2) The VOC content of each material applied, in pounds per gallon (lbs/gal);
 - (3) The name/identification of each individual HAP contained in each material applied, and the pound(s) per gallon (lbs/gal.) of each individual HAP; and,
 - (4) The combined HAP content for each material applied, in pounds per gallon (lbs/gal).

- b) The permittee shall maintain monthly records of the following information. Any credible method for performing these calculations is acceptable so long as the permittee retains records showing how they were completed.
- (1) The total volume of each coating, thinning solvent, and cleanup solvent applied in emissions units K001 and K006, in gallons.
 - (2) The total coating usage applied in emissions units K001 and K006, in gallons (sum of each coating used in 3.b)(1)).
 - (3) The total VOC emissions for each month from emissions units K001 and K006, in tons (i.e., the summation of the products of the total volume of each coating applied, in gallons (as determined in 3.b)(1)) multiplied by the VOC content of each coating applied (as determined in 3.a)(2)), divided by 2,000 pounds).
 - (4) For each individual HAP, the total HAP emissions from all the materials applied, in ton(s) (i.e., for each individual HAP, the summation of the products of 3.b)(1) multiplied by 3.a)(3) for all the materials applied during the month, divided by 2,000 pounds).
 - (5) For total combined HAP(s), the total HAP emissions from all the materials applied during the month, in ton(s) (i.e., the summation of all the individual HAP(s) emissions from 3.b)(4) above).
 - (6) For coating usage for emissions unit K001 and K006, combined, the total usage during the rolling, 12-month period (i.e., the summation of the monthly coating usage applied, as recorded in 3.b)(2) above, for the present month plus the previous 11 months of operation, in ton(s).
 - (7) The total VOC emissions for emissions units K001 and K006, combined, during the rolling 12-month period (i.e., the summation of all VOC emissions, as recorded in 3.b)(3) above, for the present month plus the previous 11 months of operation, in ton(s)).
 - (8) For each individual HAP, the total facility-wide emissions during the rolling, 12-month period (i.e., the summation of the individual HAP emissions, as recorded in 3.b)(4) above, for the present month plus the previous 11 months of operation, in ton(s)).
 - (9) The total facility wide combined HAP emissions during the rolling 12-month period (i.e., the summation of all HAP emissions, as recorded in 3.b)(5) above, for the present month plus the previous 11 months of operation, in ton(s)).

*A listing of the Hazardous Air Pollutants (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 or cleanup materials. This information does not have to be kept on a line by line bases.

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:

<u>Emissions Unit ID</u>	<u>Terms & Condition</u>
K001 and K006, combined	Emissions of VOCs shall not exceed 9.49 tons per year (TPY), including cleanup, based upon a rolling, 12-month summation of monthly emissions.
K001 and K006, combined	Coating usage shall not exceed 5,000 gallons per rolling 12-month period.
Facility Wide	Emissions of Individual HAP(s) shall not exceed 9.9 tons per year (TPY), based upon a rolling, 12-month summation of monthly emissions.
Facility Wide	Emissions of total combined HAP(s) shall not exceed 24.9 tons per year (TPY), based upon a rolling, 12-month summation of monthly emissions.

- 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 B.2. above shall be determined in accordance with the following methods:

- a) Emissions Limitation:

The maximum annual coating usage for emissions units K001 and K006, combined shall not exceed 5,000 gallons, based upon a rolling, 12-month summation of the coating usage figures.

Applicable compliance Method:

Compliance shall be based upon the record keeping specified in 3.a) and 3.b) above.

b) Emissions Limitation:

The facility wide emissions of HAPs from this facility shall be less than 9.9 TPY for any single HAP based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in 3.a) and 3.b) above.

c) Emissions Limitation:

The facility wide emissions of HAPs from this facility shall be less than 24.9 TPY for any combination of HAPs, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in 3.a) and 3.b) above.

d) Emission Limitations:

The emissions of VOC from emissions units K001 and K006, combined, shall not exceed 9.49 tons per year, including cleanup, 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.

6. The Ohio EPA has determined that this facility may be subject to the requirements of a federal rule that the Ohio EPA does not have the delegated authority to implement. Specifically:

a) On January 9, 2008, U.S. EPA promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR Part 63, Subpart HHHHHH. Spray applications using coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) and paint stripping operations using methylene chloride must be operated in compliance with this federal rule; and/or

b) On July 23, 2008, U.S.EPA promulgated the NESHAP for Nine Metal Fabrication and Finishing Source Categories at Area Sources, 40 CFR Part 63, Subpart XXXXXX. Metal fabrication of finishing metals containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) must be operated in compliance with this federal rule.

Although Ohio EPA has determined that one or both of these rules (also known as a GACT) may apply, 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 these rules



Draft Permit-to-Install and Operate

SEW EURODRIVE

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are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.

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 a 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.



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C. Emissions Unit Terms and Conditions



1. K001, Paint Spray Booth #1

Operations, Property and/or Equipment Description:

Miscellaneous metal parts coating booth with drying oven

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)(2)b., and and d)(7).

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	The volatile organic compound (VOC) content of the coatings employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(d). See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 tons/year taking into account the federally enforceable restrictions in B.2.a).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b.(2)b. below.
c.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V and MACT)	See Facility Wide Terms and Conditions B.2, B.3, B.4 and B.5.
d.	OAC rule 3745-21-09(U)(1)(d)	The VOC content of the coatings employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents. The emissions limitation specified by this rule is equivalent to the limitation established pursuant to OAC rule 3745-31-05(A)(3). See b)(2)c.and d)(1).
e.	OAC rule 3745-17-11(C)	See c)(1) and c)(2) below.

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. The permittee has elected to comply with the VOC content limitation by use of complying coatings. Coatings applied in the coating operations shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as $C_{VOC,2}$ shown in d)(1) below.

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee must collect and record information 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 emissions limitation, as applied). In accordance with OAC rule 3745 21-09(B)(3)(f), the permittee shall collect and record the following information each month for the coating line when in operation, and shall maintain this information at the facility for a period of three years:

- a. the name and identification number of each coating, as applied; 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 filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (3) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the 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 filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the 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 filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (7) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.
- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. 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 30 days following the end of the calendar month.

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:

The VOC content of the coatings employed in this emissions unit shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

- (1) None.