Ohio Environmental Protection Agency

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

Certified Mail

5/18/2016

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

Tim Morrison
Trans-Acc
11167 Deerfield Road
Cincinnati, OH 45242

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1431050909
Permit Number: P0120793
Permit Type: Administrative Modification
County: Hamilton

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**
- **What should you do if you notice a spill or environmental emergency?**

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.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

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

Cc: SWOAQA

Ohio Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Trans-Acc

Facility ID:	1431050909
Permit Number:	P0120793
Permit Type:	Administrative Modification
Issued:	5/18/2016
Effective:	5/18/2016
Expiration:	6/6/2016

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Trans-Acc

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Authorization

Facility ID:	1431050909
Application Number(s):	M0003991
Permit Number:	P0120793
Permit Description:	Administrative modification to correct permit expiration date to a five-year renewal cycle.
Permit Type:	Administrative Modification
Permit Fee:	$0.00
Issue Date:	5/18/2016
Effective Date:	5/18/2016
Expiration Date:	6/6/2016

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

This document constitutes issuance to:

Trans-Acc
11167 Deerfield Road
Cincinnati, OH 45242

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:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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: P0120793
Permit Description: Administrative modification to correct permit expiration date to a five-year renewal cycle.

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

Emissions Unit ID:	**K009**
Company Equipment ID:	Paint Booth
Superseded Permit Number:	14-06028
General Permit Category and Type:	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.

      (2) 2, 3, 4, and 5.

2. The total usage of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001 (Paint Line 2), K002 (Paint Line 4), K007 (Paint Line 3), K009 (Blue Ash Line M), P005 (Facility Wide Misc. Solvent Use), other de minimis air contaminant sources, as defined in OAC rule 3745-15-05 and other air contaminant sources exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit combined shall not exceed 9.9 tons per year (TPY)* for any single HAP, as a rolling, 12-month summation and 24.9 TPY* for any combination of HAPs, as a rolling, 12-month summation.

   *This assumes that the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

   The permittee has existing records to demonstrate compliance with this emissions limitation upon permit issuance.

3. The permittee shall collect and record the following information each month for the emissions units identified in 2. above:

   a) The name and identification number of each coating employed.

   b) The individual HAP* content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied.

   c) The total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from b)].

   d) The number of gallons of each coating employed.

   e) The name and identification number of each cleanup/cleaning solvent employed.

   f) The individual HAP content for each HAP of each cleaning solvent, in pounds of individual HAP per gallon of cleanup/cleaning solvent, as applied.

   g) The total combined HAP content of each cleaning solvent, in pounds of combined HAPs per gallon of cleanup/cleaning solvent, as applied [sum all the individual HAP contents from f)].

h) The number of gallons of each cleanup/cleaning solvent employed.

i) The total individual HAP usage** for each HAP from all coatings and cleanup/cleaning solvents employed, in pounds or tons [for each HAP, the sum of b) times d) for all coatings plus the sum of f) times h) for all cleanup/cleaning solvents, and divided by 2,000 pounds per ton if the units are in tons].

j) The total combined HAP usage** from all coatings and cleanup/cleaning solvents employed, in pounds or tons [the sum of c) times d) for all coatings plus the sum of g) times h) for all cleanup/cleaning solvents, and divided by 2,000 pounds per ton if the units are in tons].

k) The updated rolling, 12-month summation of usage for each individual HAP**, in tons. This shall include the information for the current month and the preceding eleven calendar months.

l) The updated rolling, 12-month summation of usage for the total combined HAPs**, in tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.
** This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in 2. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

5. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling 12-month summation for the emissions units listed in 2.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be demonstrated by the record keeping requirements specified in 3.

C. Emissions Unit Terms and Conditions

1. K009, Paint Booth

Operations, Property and/or Equipment Description:

Coating Line - Combination of former emissions units K003, K004, and K005.

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

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

a. d)(6), d)(7), d)(8), and d)(9).

(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.

b. b)(2)a., c)(1), d)(5), e)(4), and f)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 147 pounds per hour, excluding cleanup and cleaning solvent. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(C), 3745-21-09(U)(1)(b), 3745-21-09(U)(1)(c), 3745-21-09(U)(1)(d), 3745-21-09(U)(1)(i), and 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V and Non-Attainment New Source Review	See Sections B.2., B.3, B.4 and B.5, b)(2)a., c)(1), d)(5), e)(4) and f(1)b.
c.	OAC rule 3745-21-09(U)(1)(c)	See b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-21-09(U)(1)(d)	See b)(2)c.
e.	OAC rule 3745-21-09(U)(1)(b)	See b)(2)e.
f.	OAC rule 3745-21-09(U)(1)(i)	See b)(2)d.
g.	OAC rule 3745-17-11(C)	See b)(2)g.

(3) Additional Terms and Conditions

a. VOC emissions from emissions unit K009, including cleanup and cleaning solvent emissions, shall not exceed 68.26 TPY based upon a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emissions limitation upon permit issuance

b. The VOC content of extreme performance coatings employed in this emissions unit shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents

c. The VOC content of coatings dried at temperatures not exceeding 200 degrees Fahrenheit employed in this emissions unit shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

d. The VOC content of coatings employed in this emissions unit, that are not specified under b)(2)b., b)(2)c., and b)(2)e. shall not exceed a daily volume-weighted average of 3.0 lbs per gallon, as applied, excluding water and exempt solvents.

e. The VOC content of zinc rich primer coatings employed in this emissions unit shall not exceed a daily volume-weighted average of 4.0 lbs per gallon, as applied, excluding water and exempt solvents.

f. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content and emission limitations

g. The permittee shall operate and maintain the dry particulate filter system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The dry filtration system shall be employed during all periods of coating application to control particulate emissions.

h. The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

c) Operational Restrictions

(1) The total VOC input from coatings and cleanup/cleaning solvents employed in emissions unit K009 (Miscellaneous Metal Parts Coating Line) shall not exceed 68.26 tons per year (TPY). Compliance with the above limitation shall be based upon a rolling, 12 month-summation of the VOC input. The VOC input shall be determined by multiplying the number of gallons of each coating and cleanup/cleaning solvent employed per month by the VOC content of each coating and cleanup/cleaning solvent, in pounds per gallon. The VOC input of coatings and cleanup/cleaning solvents shall be assumed to be 100 percent of the VOC content of the coatings and cleanup/cleaning solvents employed and, as such, is equivalent to the VOC emission rate.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry filtration system with any modifications deemed necessary by the permittee during the time period in which the dry filtration system is utilized. 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.

(2) The permittee shall conduct periodic inspections of the dry filtration system 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. The periodic inspections of the dry filtration system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the dry filtration system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

The permittee shall document each inspection of the dry filtration system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the 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.

(3) In the event that the dry filtration system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the dry filtration system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the dry

filtration system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(4) The permittee shall collect and record the following information each day for this emissions unit:

a. the name, identification number, and type (extreme performance, dried <200 degrees F, zinc rich primer, other) of each coating, as applied;

b. the VOC content of each coating material, including paint, thinner, catalyst, and other additives, in pounds per gallon, as applied;

c. the number of gallons of each coating material, as applied;

d. the daily VOC emissions from all the coatings employed, in pounds, [i.e., the sum of b. times c. for each coating employed];

e. the volume fraction VOC plus solids for each coating material. this is equivalent to [1- volume fraction of water plus exempt solvents] of each coating material; and

f. the daily volume-weighted average VOC content of all coatings used to show compliance with each of the following terms: coating type b)(2)b. through b)(2)e., individually, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.

(5) The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each coating and cleanup/cleaning solvent employed;

b. the VOC content for each coating, in pounds of VOC per gallon of coating, as applied;

c. the VOC content for each cleanup/cleaning solvent, in pounds of VOC per gallon of cleaning solvent;

d. the number of gallons of each coating employed;

e. the number of gallons of each cleanup/cleaning solvent employed;

f. the total VOC input/emissions in pounds or tons [summation of (b. x d.) for all coatings plus (c. x e.) for all cleanup/cleaning solvents and divided by 2,000 pounds per ton if the units are in tons]; and

g. the updated rolling, 12-month summation of the total VOC input/emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.

(6) The permit to install for this emissions unit (K009) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit application. 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 SCREEN 3.0, 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 is 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, i.e., 24 hours per day and 7 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 x 8/X x 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: toluene

   TLV (mg/m3): 75.37

Maximum Hourly Emission Rate (lbs/hr): 7.75

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1359

MAGLC (ug/m3): 1794

The permittee, has demonstrated that emissions of toluene, from emissions unit(s) K009, is 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).

(7) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), 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 unit(s) or its/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" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

(8) 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. 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

(9) 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 Hamilton County Department of Environmental Services of the date and length of time the dry filtration system was not in service during coating application. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

(2) The permittee shall submit annual reports to the Hamilton County Department of Environmental Services documenting 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 unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

(3) The permittee shall notify the Hamilton County Department of Environmental Services in writing of each daily record showing a daily volume-weighted average coating VOC content greater than the limitations specified in b)(2)b., b(2)c., b)(2)e., or b)(2)f, as applicable. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

(4) The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC input/emission limitation outlined in c)(1) and Section B.2. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

(5) The permittee shall submit annual reports which specify the total VOC emissions, total individual HAP emissions, and total combined HAP emissions from emissions unit K009 for the previous calendar year. These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 of each year.

(6) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The 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 in b(1) and b(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 147 pounds per hour, excluding cleanup and cleaning solvents.

Applicable Compliance Method:

Compliance with the above VOC hourly emission limitation shall be determined by multiplying the VOC content of the coating applied by the hourly coating usage rate**.**

b. Emission Limitation:

VOC emissions from emissions unit K009, including cleanup and cleaning solvent emissions, shall not exceed 68.26 TPY based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual VOC emissions limitation shall be demonstrated by the record keeping requirement in d)(5).

c. Emission Limitation:

The VOC content of extreme performance coatings employed in this emissions unit shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

The VOC content of coatings dried at temperatures not exceeding 200 degrees Fahrenheit employed in this emissions unit shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

The VOC content of zinc rich primer coatings employed in this emissions unit shall not exceed a daily volume-weighted average of 4.0 lbs per gallon, as applied, excluding water and exempt solvents.

The VOC content of coatings employed in this emissions unit, that are not specified under terms b)(2)b., b)(2)c., and b)(2)e. shall not exceed a daily volume-weighted average of 3.0 lbs per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

U.S. EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup and cleaning solvents.

Compliance with these VOC content limitations shall be demonstrated by the record keeping requirements specified in d)(4).

g) Miscellaneous Requirements

(1) If applicable, the permittee shall comply with the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources by January 10, 2011.