



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

7/7/2016

Brian Laycock
 ATSG (ABX Air Inc., AMES)
 145 Hunter Drive
 Building 1024 - Environmental
 Wilmington, OH 45177

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

Facility ID: 0514010124
 Permit Number: P0120558
 Permit Type: Initial Installation
 County: Clinton

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 News Journal. 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 Ohio EPA DAPC, Southwest District Office
 401 East Fifth Street
 Dayton, OH 45402

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 Ohio EPA DAPC, Southwest District Office at (937)285-6357.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
 Ohio EPA-SWDO; Indiana; Kentucky



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination (minimize emissions in order to assure the increased emissions does not trigger Title V and BAT requirements)

Netting Determination

2. Source Description:

ATSG Inc. is requesting an installation permit for coating operation K016. The emissions limits are based on requested synthetic minor limitations under provided in their application.

3. Facility Emissions and Attainment Status:

This is a current synthetic minor in Clinton County that is nonattainment for ozone.

4. Source Emissions:

K016, Component Overall and Repair Building 2066 for Large Parts: 6.3 tons of VOC per rolling 12 month period; and Facility-wide: 91.87 tons of VOC tons per rolling 12 month period.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	6.3

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 Initial Installation
ATSG (ABX Air Inc., AMES)

145 HUNTER DR., Wilmington, OH 45177

ID#:P0120558

Date of Action: 7/7/2016

Permit Desc: Initial installation permit for a paint booth inside Building 2066 (Component Overall and Repair) at the Wilmington Air Park to allow for the painting of larger aircraft parts..

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: Craig Osborne, Ohio EPA DAPC, Southwest District Office, 401 East Fifth Street, Dayton, OH 45402. Ph: (937)285-6357



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
ATSG (ABX Air Inc., AMES)**

Facility ID:	0514010124
Permit Number:	P0120558
Permit Type:	Initial Installation
Issued:	7/7/2016
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
ATSG (ABX Air Inc., AMES)

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Draft Permit-to-Install and Operate

ATSG (ABX Air Inc., AMES)

Permit Number: P0120558

Facility ID: 0514010124

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0514010124
Application Number(s): A0055665
Permit Number: P0120558
Permit Description: Initial installation permit for a paint booth inside Building 2066 (Component Overall and Repair) at the Wilmington Air Park to allow for the painting of larger aircraft parts.
Permit Type: Initial Installation
Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 7/7/2016
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:

ATSG (ABX Air Inc., AMES)
145 HUNTER DR
Wilmington, OH 45177

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:

Ohio EPA DAPC, Southwest District Office
401 East Fifth Street
Dayton, OH 45402
(937)285-6357

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

ATSG (ABX Air Inc., AMES)

Permit Number: P0120558

Facility ID: 0514010124

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0120558

Permit Description: Initial installation permit for a paint booth inside Building 2066 (Component Overall and Repair) at the Wilmington Air Park to allow for the painting of larger aircraft parts.

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

Emissions Unit ID:	K016
Company Equipment ID:	CRO 4#
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
ATSG (ABX Air Inc., AMES)
Permit Number: P0120558
Facility ID: 0514010124
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 Ohio EPA DAPC, Southwest District Office 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
ATSG (ABX Air Inc., AMES)
Permit Number: P0120558
Facility ID: 0514010124
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., and 4.
2. The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K004, K005, K006, K007, K008, K010, K011, K012, K013, K014, K015, and K016, along with other de minimus 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 and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
3. The permittee shall collect and record the following information each month for those emissions units listed in 2:
 - a) the company identification for each HAP-emitting material (i.e., all HAP-containing coatings, clean-up materials, resins, adhesives, potting compounds, plating chemicals, etc.);
 - b) the individual HAP content of each HAP emitting material;
 - c) the total combined HAP content of each HAP emitting material (i.e. sum of individual HAP contents from b);
 - d) the amount of each individual HAP emitting material employed;
 - e) the hours of operation, or other emissions determining rationale, of individual HAP-generating sources (e.g., fuel combustion, sanding/grinding operations, plating);
 - f) the amount of combined HAP emitting material employed;
 - g) the total individual HAP emissions from all HAP-emitting materials employed (b times d) and all HAP-generating sources, in pounds or tons per month (d times e);
 - h) the hours of operation, or other emissions determining rationale, of combined HAP-generating sources (e.g., fuel combustion, sanding/grinding operations, plating);
 - i) the total combined HAP emissions from all HAP emitting materials employed (c times f) and all combined HAP-generating sources, in pounds or tons per month (summation of the h);

- j) the rolling, 12-month summation of individual HAP emissions from all HAP-emitting materials employed (summation of g) and all individual HAP-generating sources (summation of g), in tons; and
 - k) the rolling, 12-month summation of total combined HAP emissions from all HAP-emitting materials employed (summation of i) and all HAP-generating sources, in tons (summation of i).
4. The permittee shall submit quarterly deviation (excursion) reports for the following emissions unit(s) listed in 2 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:
 - (1) The rolling 12-month individual HAP emissions is equal to or greater than 10 tons from this facility; and
 - (2) The rolling 12-month combined HAP's emission is equal to or greater than 25 tons from this facility.
 - 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).

5. 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.



Draft Permit-to-Install and Operate

ATSG (ABX Air Inc., AMES)

Permit Number: P0120558

Facility ID: 0514010124

Effective Date: To be entered upon final issuance

6. Compliance with the emission limitations in 2. of these terms and conditions shall be determined in accordance with the following method:

a) Emission Limitation:

10.0 tons for any single HAP and 25.0 tons for any combination of HAPs, based on rolling, 12-month summations for the emissions units listed in 2.

Applicable Compliance Method:

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



Draft Permit-to-Install and Operate
ATSG (ABX Air Inc., AMES)
Permit Number: P0120558
Facility ID: 0514010124
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. K016, CRO 4#

Operations, Property and/or Equipment Description:

Component Overall and Repair Building 2066 for Large 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. b)(1)b., b)(1)f. and d)(3), below.

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

a. b)(1)c., c)(1), c)(2), d)(1), d)(2), and e)(1) below.

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) as effective 06/30/08	<p>Volatile organic compound (VOC) emissions from coating operations from this emissions unit shall not exceed 0.53 ton per month averaged over a twelve-month rolling period.</p> <p>See b)(2)a., below.</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	<p>The Best Available Technology (BAT) requirements under OAC rule 3745-311-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 tons per year.</p> <p>See b)(2)b., below.</p>
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V requirements and the applicability of 40 CR Part 63 Subpart GG)	<p>Volatile organic compound (VOC) emissions from this emissions unit from the use of coating materials shall not exceed 6.3 ton rolling 12-month limit.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The combined VOC emissions from the use of coating and liquid organic cleanup materials employed in emissions units K001, K004, K005, K006, K007, K010, K011, K012, K013, K014, K015, and K016 shall not exceed 9.4 tons per rolling 12-month period. See 1.b)(1) of Section B.
d.	OAC rule 3745-17-11(C)	Exempt. See b)(2)c, below.
e.	OAC rule 3745-21-09(U)(2)(b)	See b)(2)d, below.
f.	OAC rule 3745-114-01	Ohio Toxic Rule

(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. Under OAC rule 3745-17-11(A)(1)(h) and OAC rule 3745-17-11(A)(1)(l) exempts surface coating processes that apply only dip coatings, roll coatings, flow coatings, or brush coatings, and large size items are exempt from the requirements under OAC rule 3745-17-11(C).
- d. OAC rule 3745-21-09(U)(2)(b) exempts the application of an exterior coating to airplanes from the coating requirements of OAC rule 3745-21-09(U).

c) Operational Restrictions

- (1) To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the VOC emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative VOC emissions, in tons
1	1.0
1-2	1.3



1-3	1.9
1-4	2.6
1-5	3.2
1-6	3.8
1-7	4.5
1-8	5.1
1-9	5.7
1-10	6.3
1-11	6.3
1-12	6.3

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with annual emission limitation for VOC shall be based upon a rolling 12-month summation of the monthly emissions.

- (2) The combined liquid organic cleanup material employed in emissions units K001, K004, K005, K006, K007, K010, K011, K012, K013, K014, K015, and K016 shall not exceed the following;
 - a. The rolling 12-month liquid organic cleanup material usage of 2,500 gallons; and
 - b. The maximum liquid organic cleanup material volatile organic compound (VOC) content of 7.5 pounds per gallon.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain the following monthly records:
 - a. The name and identification number of each coating employed;
 - b. The amount of each material employed, in gallons;
 - c. The VOC content of coatings employed in pounds per gallon;
 - d. The total VOC emissions from all coatings, in pounds, (the summation of "b" x "c" for all coatings);
 - e. The total VOC emissions, in tons per rolling 12-month period from all coatings employed from this emissions unit (the summation of the total VOC emissions for the current month "d", plus the total VOC emissions "d" for each of the previous 11 months), in tons per rolling 12-month period; and

- f. The total VOC emissions, in tons per month averaged over a rolling, 12-month period ("e" divided by 12).
- (2) The permittee shall collect and record the following information for each month for the cleanup materials employed in emissions units K001, K004, K005, K006, K007, K010, K011, K012, K013, K014, K015, and K016:
- a. the company identification for each clean-up material employed;
 - b. the number of gallons of each clean-up material employed. The clean-up material employed may be based on purchasing records or actual usage tracking;
 - c. the VOC content of clean-up material, in pounds per gallon;
 - d. the total combined VOC generated clean-up materials employed, in tons per month;
 - e. the amount of clean-up material recovered, in gallons;
 - f. the VOC content of recovered clean-up material, in percent by volume;
 - g. the estimated amount of clean-up material recovered, in gallons, (the summation of: ("e" x "f"));
 - h. the total amount of VOC material recovered, in tons per month, (the summation of: [("g" x 7.5 pounds of gallon*)/ 2000]);
 - i. the total combined monthly VOC emissions, in tons per month, (the summation of: ("d" - "h"); and
 - j. the total combined rolling, 12-month summation VOC emissions, in tons. The rolling, 12-month summation of the total VOC emissions (the total amount of VOC emissions for the current month ("i") plus the total amount of VOC emissions for the 11 previous calendar months).

* This assumed VOC content of 7.5 pounds per gallon is lower than VOC content of the clean-up solvents that will be employed at this facility and will be used to represent the worst case emissions as based on the facility's application. VOC emission rates calculated based on purchasing records are assumed to represent the worst case actual emissions and may be used to demonstrate compliance with the above list VOC emission limitations, in section d).

- (3) 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 permittees to apply for and obtain a new or modified PTIO 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 PTIO.

e) Reporting Requirements

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

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. VOC emissions from this emissions unit exceeds 0.53 ton per month averaged over a 12-month rolling period;
 - ii. VOC emissions from this emissions unit exceeds 6.3 ton rolling 12-month limit;
 - iii. The combined VOC emissions from the use of liquid organic cleanup materials employed in emissions units K001, K004, K005, K006, K007, K010, K011, K012, K013, K014, K015, and K016 exceeds 9.4 tons per rolling 12-month period; and
 - iv. Any of the limitations listed in c)(2);
- 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).

(2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is

considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) **Testing Requirements**

- (1) Compliance with the 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. **Emission Limitations:**

0.53 ton per month average over a rolling, 12-month period;

6.3 tons of VOC per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements specified in section d), as established in this permit.

b. **Emission Limitation:**

The combined VOC emissions from the use of liquid organic cleanup materials employed in emissions units K001, K004, K005, K006, K007, K010, K011, K012, K013, K014, K015, and K016 shall not exceed 9.4 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements specified in section d), as established in this permit.

g) **Miscellaneous Requirements**

- (1) None.