Ohio Environmental Protection Agency

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

Certified Mail

7/19/2016

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

Jeffery Norris
SHEFFER CORP
6990 CORNELL RD
BLUE ASH, OH 45242

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1431050974
Permit Number: P0121161
Permit Type: Initial Installation
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

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
SHEFFER CORP

Facility ID:	1431050974
Permit Number:	P0121161
Permit Type:	Initial Installation
Issued:	7/19/2016
Effective:	7/19/2016
Expiration:	7/19/2026

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
SHEFFER CORP

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Authorization

Facility ID: 1431050974
Application Number(s): A0056238
Permit Number: P0121161
Permit Description: General Permit 3.10-for Miscellaneous Metal Parts Coating Line
Permit Type: Initial Installation
Permit Fee: $200.00
Issue Date: 7/19/2016
Effective Date: 7/19/2016
Expiration Date: 7/19/2026
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

SHEFFER CORP
6990 CORNELL RD
Blue Ash, 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: P0121161
Permit Description: General Permit 3.10-for Miscellaneous Metal Parts Coating Line

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:	Top Coat Booth (Conveyor Booth IFG-080708)
Superseded Permit Number:	
General Permit Category and Type:	Miscellaneous Metal Parts and Products Coating Lines - Subject to OAC rule 3745-21-09(U)(1) and uncontrolled or restricted VOC emissions <10 TPY (GP 3.10)

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. K001, Miscellaneous Metal Parts and Products Coating Line

Operations, Property and/or Equipment Description:

Misc. metal parts and products coating line subject to OAC rule 3745-21-09(U)(1) and uncontrolled or restricted VOC emissions <10 TPY (GP 3.10)

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)c., b)(2)b., d)(10), d)(11) and e)(4)

(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), as effective 6/30/08	Volatile organic compound (VOC) emissions from coating and cleaning material use shall not exceed 0.83 ton per month averaged over a 12-month rolling period. The requirements of this rule include compliance with the requirements of OAC rule 3745-17-11(C). See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 6/30/08	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, or, the calculated annual emission rate is less than 10

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		tons/year taking into account the voluntary restriction. The Best Available Technology (BAT) requirements under 3745-31-05(A)(3) do not apply to particulate emissions since the calculated annual emission rate is less than 10 tons/year taking into account the federally enforceable work practice requirements in OAC rule 3745-17-11(C). See b)(2)b. below.
c.	OAC rule 3745-31-05(E), as effective 6/30/08	See c)(1) below. VOC emissions shall not exceed 9.96 tons per year.
d.	OAC rule 3745-17-11(C)	See b)(2)c. and c)(2)-(3) below.
e.	OAC rule 3745-21-09(U)(1)	See b)(2)d. 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) (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. This emissions unit is exempt from the particulate control requirements in OAC rule 3745-17-11(C) and c)(2)-(3) and d)(5)-(9) of this permit if the miscellaneous metal coating line meets any one of the following criteria:

i. surface coating processes that apply only dip coatings, roll coatings, flow coatings, or brush coatings; or

ii. surface coating processes (e.g., for sealers, adhesives, and deadeners) that employ airless spray and bead-type (extrusion) application methods.

d. The VOC content of the coatings employed shall not exceed the following limitations, as applied:

i. 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a clear coating;

ii. 4.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a zinc rich primer coating;

iii. 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating;

iv. 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for any coating that is dried at temperatures not exceeding two hundred degrees Fahrenheit;

v. 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the interior coating of a steel pail or drum;

vi. 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the exterior coating of a steel pail or drum;

vii. 4.9 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a glass adhesion body primer coating used for the installation of any glass windows during the assembly of automobiles and trucks;

viii. 6.2 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a high performance architectural aluminum coating; or

ix. 3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, for any coating that is not regulated under any of the eight categories listed above.

If a miscellaneous metal parts and products coating is subject to two or more of the VOC content limitations listed above the limit which is least restrictive shall apply.

c) Operational Restrictions

(1) To ensure compliance with the VOC emissions limitation of 0.83 tons per month as averaged over a 12-month period, the permittee shall either:

a. Comply with the recordkeeping requirements in d)(2); or

b. Limit total coating and cleaning material employed to 220 gallons per month as averaged over a 12-month period and comply with the recordkeeping requirements in d)(1).

[Note: the number of gallons of coatings and cleaning material employed is the difference between the gallons of coatings and cleaning material received and the gallons of cleaning material shipped off site if records are maintained pursuant to d)(3).]

(2) The permittee shall install and operate 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.

(3) 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) If the permittee chooses to demonstrate compliance with the monthly coating and cleaning material usage limit of 220 gallons averaged over a 12-month period, the permittee shall collect and record the following information each month for the miscellaneous metal coating line:

a. the volume, in gallons, of each coating (including all components, such as thinners and additives) employed;

b. the volume, in gallons, of each cleaning material employed;

c. the total volume, in gallons, of all coatings and cleaning materials employed; and

d. the average monthly coating and cleaning material usage, in gallons, over a 12-month period, i.e., the total usage for the present month plus the previous 11 months, in gallons, divided by 12 months

(2) If the permittee chooses to demonstrate compliance with the VOC emissions limitation of 0.83 tons per month as averaged over a 12-month period by maintaining monthly VOC emissions records, the permittee shall collect and record the following information in either d)(2)a. or b. each month for the miscellaneous metal coating line:

a. <u>Coating As Applied Option:</u>

i. the name, identification number and type (for example, clear coat subject to OAC rule 3745-21-09(U)(1)(a)) of each coating applied and each cleaning material employed;

ii. the VOC content, in pounds per gallon, of each coating, as applied (including any additives or thinners, if applicable) and each cleaning material;

iii. the volume, in gallons, of each coating employed;

iv. the volume, in gallons, of each cleaning material employed;

v. the VOC emissions from coating (VOC_{CO}), in pounds of VOC per month, calculated as follows:

$$VOC_{CO}\ (\text{pounds/month}) = \sum_{i=1}^{n} (G \times C_{CO})$$

Where:

G = volume of each coating employed, in gallons, as recorded in d)(2)a.iii. above;

C_{CO} = VOC content of each coating, as applied, in pounds per gallon, as recorded in d)(2)a.ii. above; and

n = total number of coatings employed during the month;

vi. the VOC emissions from cleaning materials employed (VOC_{CL}), in pounds of VOC per month, calculated as follows:

$$VOC_{CL}\ (\text{pounds/month}) = \sum_{i=1}^{n} (G \times C_{CL})$$

Where:

G = volume of each cleaning material employed, in gallons, as recorded in d)(2)a.iv. above;

C_{CL} = VOC content of each cleaning material employed, in pounds per gallon, as recorded in d)(2)a.ii. above; and

n = total number of cleaning materials employed during the month; and

vii. the total VOC emissions from all coatings and cleaning materials employed, in pounds of VOC per month, calculated as follows:

Total VOC (pounds/month) = VOC_{CO} (as recorded in d)(2)a.v.) + VOC_{CL} (as recorded in d)(2)a.vi.).

viii. the average monthly VOC emissions over a 12-month period, i.e., the total VOC emissions for the present month plus the previous 11 months, in tons, divided by 12 months.

b. <u>Inventory Method:</u>

i. the name, identification number and type (for example, clear coat subject to OAC rule 3745-21-09(U)(1)(a)) of each coating employed and each cleaning material employed;

ii. the VOC content, in pounds per gallon, of each coating component and each cleaning material as packaged;

iii. the volume, in gallons, of each coating component employed;

iv. the volume, in gallons, of each cleaning material employed;

v. the VOC emissions from coating (VOC_{CO}), in pounds of VOC per month, calculated as follows:

$$VOC_{CO}\ (\text{pounds/month}) = \sum_{i=1}^{n} (G \times C_{CO})$$

Where:

G = volume of each coating component employed, in gallons, as recorded in d)(2)b.iii. above;

C_{CO} = VOC content of each coating component, in pounds per gallon, as recorded in d)(2)b.ii. above; and

n = total number of coating components employed during the month;

vi. the VOC emissions from cleaning materials employed (VOC_{CL}), in pounds of VOC per month, calculated as follows:

$$VOC_{CL}\ (\text{pounds/month}) = \sum_{i=1}^{n} (G \times C_{CL})$$

Where:

G = volume of each cleaning material employed, in gallons, as recorded in d)(2)b.iv. above;

C_{CL} = VOC content of each cleaning material employed, in pounds per gallon, as recorded in d)(2)b.ii. above; and

n = total number of cleaning materials employed during the month;

vii. the total VOC emissions from all coatings and cleaning materials employed, in pounds of VOC per month, calculated as follows:

Total VOC (pounds/month) = VOC_{CO} (as recorded in d)(2)b.v.) + VOC_{CL} (as recorded in d)(2)b.vi.).

viii. the average monthly VOC emissions over a 12-month period, i.e., the total VOC emissions for the present month plus the previous 11 months, in tons, divided by 12 months.

(3) If coatings and cleaning materials are collected for off-site disposal and/or recovery, the following records shall be maintained if a credit is to be applied to the monthly VOC emissions recorded in d)(2)a.vii. or d)(2)b.vii. above:

a. the amount of coating and cleaning material recovered during the month* for off-site disposal and/or recovery, in gallons (or pounds, if records of recovered coating and cleaning material is maintained by weight);

b. the VOC content of the recovered coating and cleaning material shall be based on the lowest VOC content of any cleaning material collected, in pounds per gallon (or percent by weight if records of recovered coating and cleaning material is maintained by weight); or it may be based upon a laboratory analyses provided by the facility to which the waste material is shipped;

c. the date the recovered coating and cleaning material was shipped, the amount shipped (minus the container), and the name and address of the receiving, disposal, and/or recovery facility; and

d. the total VOC, in pounds per month, in coating and cleaning materials collected for off-site disposal and/or recovery (i.e. summation of d)(3)a. times d)(3)b.).

* A daily log may be required for recovered coating and waste cleaning material, where a record of the monthly total volume or weight of the collected material cannot be accurately maintained. This amount shall be adjusted if the volume or weight shipped is less than the sum of the monthly recovered coating and cleaning material added to the container.

(4) The permittee must collect and record the following information for the miscellaneous metal parts coating line to demonstrate compliance with the coating VOC content limitations, either by means of use of complying coatings (i.e., each coating used complies with the applicable emissions limitation, as applied), or by means of a daily volume-weighted average VOC content. All records shall be maintained at the facility for a period of three years.

a. <u>Compliant Coating Option. If selecting this option, the permittee must collect and record the following information each month</u>:

i. the name and identification number of each coating, as applied; and

ii. 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.

b. Daily Weighted Average Option. If selecting this option, the permittee must collect and record the following information each day:

i. the name and identification number of each coating, as applied;

ii. the mass of VOC per volume of coating (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and

iii. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$, as follows:

$$(C_{VOC,2})_A = \sum_{i=1}^{n} C_{VOC,2i}\, L_{Ci}\, (V_{Si} + V_{VOCi}) \Big/ \sum_{i=1}^{n} L_{Ci}\, (V_{Si} + V_{VOCi})$$

Where:

$(C_{VOC,2})_A$ is the daily volume-weighted average VOC content of all coatings, as applied; and

$C_{VOC,2}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

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

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

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

V_S = the 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;

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

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period “t”;

L_C = liquid volume of coating employed during time period “t”, in gallons of coating;

M_C = mass of coating employed during the time period “t”, in pounds of coating;

i = subscript denoting a specific coating employed during time period “t”;

n = total number of coatings employed during time period “t”; and

t = time period specified for the weighted average VOC content is per day and not included in the calculation.

(5) 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.

(6) 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.

(7) 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.

(8) 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.

(9) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate 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.

(10) If the maximum annual emissions of any toxic air contaminant, as defined in OAC rule 3745-114-01, exceed one ton per year, the following requirements apply:

a. The permittee has confirmed that potential emissions of each toxic air contaminant from this emissions unit are less than the applicable maximum hourly emission rate listed in Appendix A of the Qualifying Criteria document for GP 3.10. The maximum hourly emission rate for each compound was established at less than eighty per cent of its maximum acceptable ground level concentration (MAGLC) as determined through toxic air contaminant modeling.

b. New coating or cleaning materials shall not be employed in this emissions unit without evaluating each toxic air contaminant in accordance with Appendix A of the Qualifying Criteria document for GP 3.10.

c. Other important changes that can affect the parameters/values used in determining compliance with the maximum hourly emission rate include, but are not limited to, the following:

i. 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;

ii. 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

iii. 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 by demonstrating that potential emissions of each toxic air contaminant do not exceed its maximum hourly emission rate in Appendix A of the Qualifying Criteria document for GP 3.10, 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.

d. Prior to making a "modification" as defined by OAC rule 3745-31-01, the permittee must evaluate any changes in the composition of the materials used or use of new materials that would cause the emissions of any toxic air contaminant to increase as determined in accordance with Appendix A of the Qualifying Criteria document for GP 3.10. The permittee must apply for an individual permit-to-install and operate if new or increased emissions of any toxic air contaminant no longer comply with the applicable maximum hourly emission rate in Appendix A of the Qualifying Criteria document for GP 3.10.

e. The Director may consider any significant departure from the operations of the emissions unit that the permittee committed to in the Qualifying Criteria document to be a modification that results in greater emissions than the emission rate modeled, and he/she may require the permittee to submit a permit application for the increased emissions.

f. The permittee shall maintain a record of any change made to a parameter or value used to evaluate emissions of toxic air contaminants to complete the Qualifying Criteria document for GP 3.10 to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F). The record shall include the date and reason(s) for the change and if the change would increase the maximum emission rate of any toxic air contaminant or result in the emission of a new toxic air contaminant.

(11) If the maximum annual emissions of any toxic air contaminant, as defined in OAC rule 3745-114-01, do not exceed one ton per year, modeling to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), is not necessary. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install and operate 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 permit-to-install and operate.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

(3) The permittee shall notify the Ohio EPA district office or local air agency in writing of any daily record showing use of noncomplying coatings or the daily volume-weighted average VOC content in excess of the applicable limitation. The notification shall include a copy of such record and shall be sent to the appropriate Ohio EPA district office or local air agency within 30 days after the exceedence occurs for the compliant coating option or 45 days after the exceedance occurs for the daily volume-weighted average option.

(4) If the maximum annual emissions of any toxic air contaminant, as defined in OAC rule 3745-114-01, exceed one ton per year, the permittee shall include any change made to a parameter or value used to evaluate emissions of toxic air contaminants to complete the Qualifying Criteria document for GP 3.10 to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), in the annual PER. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

(1) Compliance with the emissions limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emissions Limitation</u>:
VOC emissions from coating and cleaning material use shall not exceed 0.83 ton per month averaged over a 12-month rolling period.

<u>Applicable Compliance Method</u>:
Compliance with the VOC emissions limitation shall be demonstrated by compliance with the coating and cleaning material usage limit of 220 gallons per month as averaged over a 12-,month period as documented by the recordkeeping requirements in d)(1), or, the actual average VOC emissions for a 12-month period as documented by the record keeping requirements in d)(2).

b. <u>Emissions Limitations</u>:
The VOC content of the coatings employed shall not exceed the limitations listed in b)(2)d, as applied.

Applicable Compliance Method:
Compliance with the coating content limitation shall be demonstrated based on the recordkeeping requirements in d)(4).

(2) Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of all coatings and cleaning materials.

g) Miscellaneous Requirements

(1) None.