Ohio Environmental Protection Agency

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

8/5/2016

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

Jack Carney
Mettler Toledo
6600 Huntley Road
Columbus, OH 43229

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

Facility ID: 125041956
Permit Number: P0120876
Permit Type: Renewal
County: Franklin

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 Columbus Dispatch. 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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted.Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now.If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA-CDO

Permit Strategy Write-Up

1. Check all that apply:

   XSynthetic Minor Determination

   Netting Determination

2. Source Description:
   Mettler Toledo manufactures scales and balances at their facility located at 6600 Huntley Rd. Franklin County Ohio 43229. The facility contains the following significant emissions units: the No. 1 floor scale paint line with associated still for recovery of cleaning solvent (K001); a spray paint booth with associated bake oven and still used for recovery of cleaning solvent (K003); and a wheelabrator and structural descaler (P002). Mettler Toledo is requesting through this permit action to increase the coating restrictions associated with K001 and K003 while maintain the facility's synthetic minor status.

3. Facility Emissions and Attainment Status:
   The facility is currently a synthetic minor for VOC and HAPs to avoid Title V status and MACT requirements. Franklin county is currently designated as a maintenance area for the annual PM2.5 standard; marginal nonattainment for the 8-hour ozone standard; and attainment for all other standards.

4. Source Emissions:

   Coating and Cleanup Materials Maximum VOC Contents:

   K001 Cleanup Material = 6.73 lbs/gallon per FEPTIO Application
   K003 Cleanup Material = 7.30 lbs/gallon per FEPTIO Application
   K001 and K003 Extreme Performance Coating = 3.5 lbs/gallon per OAC rule 3745-21-09(U)(1)(c)
   K001 and K003 Zinc Rich Primer Coatings = 4.0 lbs/gallon per OAC rule 3745-21-09(U)(1)(b)

   Current Coating and Cleanup Materials Restrictions:

   K001 and K003 Combined Cleanup Material Usage Limit = 1800 gallons
   K001 and K003 Combined Extreme Performance Coating Usage Limit = 27,200 gallons
   K001 and K003 Combined Zinc Rich Primer Coating Usage Limit = 250 gallons

   New Coating and Cleanup Materials Restrictions:

   K001 Cleanup Material Usage Limit = 600 gallons
   K003 Cleanup Material Usage Limit = 1200 gallons
   K001 and K003 Combined Extreme Performance Coating Usage Limit = 43,691 gallons
   K001 and K003 Combined Zinc Rich Primer Coating Usage Limit = 500 gallons

   K001, K003, and P002 Combined Potential to Emit with Current Restrictions:

   VOC = 54.1 tons per year
   HAP = 9.9 tons per year
   HAPs = 24.9 tons per year
   PM = 7.2 tons per year

K001, K003, and P002 Combined Potential to Emit with New Restrictions:

VOC = 83.86 tons per year
HAP = 9.9 tons per year
HAPs = 24.9 tons per year
PM = 11.9 tons per year (See 6. for details)

5. Conclusion:
The limits, recordkeeping, and control requirements contained within this permit will restrict the facility from achieving major source status while effectively assuring the health and safety of the general public.

6. Please provide additional notes or comments as necessary:

Since only the long term emissions limits were changed, BAT was carried forward from the previous permit with the exception of changing a reference to OAC Rule 3745-17-11(B) to 3745-17-11(C). Previous permits had misapplied Rule 3745-17-11(B) and established a short term PM emissions limitation for K001 and K003. This permit removes the short term limit established under 3745-17-11(B) and replaces it with the control requirements from 3745-17-11(C) which should have been applied to K001 and K003 as miscellaneous metal parts coating lines. This change accounts for the increase in the facility's PM potential to emit.

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

Pollutant	Tons Per Year
VOC	83.86
HAP	9.9
HAPs	24.9
PM	11.9

PUBLIC NOTICE

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

Draft Air Pollution Permit-to-Install and Operate Renewal
Mettler Toledo
6600 Huntley Road,, Worthington, OH 43229
ID#:P0120876
Date of Action: 8/5/2016
Permit Desc:FEPTIO renewal permit for K001, K003, and P002 with an increase in coating usage restrictions..
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: Adam Novak, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Mettler Toledo

Facility ID:	0125041956
Permit Number:	P0120876
Permit Type:	Renewal
Issued:	8/5/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Mettler Toledo

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Authorization

Facility ID:	0125041956
Application Number(s):	A0056040
Permit Number:	P0120876
Permit Description:	FEPTIO renewal permit for K001, K003, and P002 with an increase in coating usage restrictions.
Permit Type:	Renewal
Permit Fee:	$0.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	8/5/2016
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:

Mettler Toledo
6600 Huntley Road
Worthington, OH 43229

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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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: P0120876
Permit Description: FEPTIO renewal permit for K001, K003, and P002 with an increase in coating usage restrictions.

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:	K001
Superseded Permit Number:	P0117739
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K003**
Company Equipment ID:	K003
Superseded Permit Number:	P0117739
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	Shotblaster
Superseded Permit Number:	P0108125
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 Ohio EPA DAPC, Central 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 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

Operations, Property and/or Equipment Description:

#1 Floor Scale Paint Line and still used for recovery of paint equipment cleaning solvent

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)g.,d)(4) – (8), and e)(5).

(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)f., b)(2)a. – c., c)(3) – (5), d)(3) and e(3)

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) [Established by PTI 01-2249, issued final 12/20/1989]	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(A), 3745-17-11(C), 3745-21-09(U)(1)(b), and 3745-21-09(U)(1)(c).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed twenty percent opacity, as a six minute average, except as provided by rule.
c.	OAC rule 3745-17-11(C)	See c)(1) and (2). and d)(9)-(13)
d.	OAC rule 3745-21-09(U)(1)(b)	The volatile organic compounds (VOC) content of the zinc rich primer coatings shall not exceed 4.0 pounds per gallon (lbs/gal), excluding water and exempt solvents.
e.	OAC rule 3745-21-09(U)(1)(c)	The VOC contents of the extreme performance coatings shall not exceed 3.5 lbs/gal, excluding water and exempt solvents.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-31-05(D) [Synthetic Minor to avoid Title V and MACT applicability]	See b)(2)a. – b)(2)c. and c)(3)-(5)
g.	ORC 3704.03(F) and OAC rule 3745-114	See d)(4) – (8), and e)(5)

(2) Additional Terms and Conditions

a. VOC emissions from all coatings, thinners, and cleanup materials employed in K001 and K003 combined shall not exceed 83.86 tons per rolling, 12-month period.

b. Individual hazardous air pollutant (HAP) emissions from all coatings, thinners, and cleanup materials employed in emissions units K001 and K003 combined, shall not exceed 9.9 tons per rolling, 12-month period.

c. Combined HAP emissions from all coatings, thinners, and cleanup materials employed in emissions units K001 and K003 combined, shall not exceed 24.9 tons per rolling, 12-month period.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

(3) The maximum annual coating usage for emissions units K001 and K003 shall not exceed 43,691 gallons of Extreme Performance Coatings, with a maximum VOC content of 3.5 pounds per gallon, and 500 gallons for Zinc Rich Primer, with a maximum VOC content of 4.0 pounds per gallon, based upon a rolling 12-month summation of coating usage figures.

(4) The maximum annual cleanup material usage for emissions unit K001 shall not exceed 600 gallons, based upon a rolling 12-month summation of the cleanup/solvent material usage figures.

(5) The maximum annual cleanup material usage for emissions unit K003 shall not exceed 1,200 gallons, based upon a rolling 12-month summation of the cleanup/solvent material usage figures.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records and document any time period when the dry filtration system was not in service when the emissions unit was in operation.

(2) The permittee shall collect and record the following information each month for the paint line:

a. the name and identification of each coating;

b. whether each coating is an extreme performance coating or a zinc rich primer coating; and

c. the VOC content of each coating (excluding water and exempt solvents) in pounds per gallon, as applied.

(3) The permittee shall collect and record the following information each month for emissions units K001 and K003:

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

b. the VOC content of each coating, as applied;

c. the individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from c);

e. the number of gallons of each coating employed;

f. the name and identification of each cleanup/solvent material employed;

g. the VOC content of each cleanup/solvent material employed;

h. the individual HAP content of each HAP of each cleanup/solvent material in pounds of individual HAP per gallon cleanup/solvent material, as applied;

i. the total combined HAP content of each cleanup/solvent material in pounds of combined HAPs per gallon of cleanup/solvent material, as applied (sum of all individual HAP contents from h.);

j. the number of gallons of each cleanup/solvent material employed;

k. the total VOC emissions from all coating, in pounds or tons per rolling, 12-month period (the sum of b. times e. for each coating);

l. the total VOC emissions from all cleanup/solvent materials, in pounds or tons per rolling, 12-month period (the sum of g. times j. for each cleanup/solvent material);

m. the total individual HAP emissions for each HAP from all coating and cleanup/solvent material in pounds or tons per rolling, 12-month period (for each HAP the sum of c. times e. for each coating and the sum of h. times j. for each cleanup/solvent material); and

n. The total combined HAP emissions from all coating and cleanup/solvent materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of d. times e. for each coating plus the sum of i. times j. for each cleanup/solvent material).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting you Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvent contained in the interior coatings or clean materials. This information does not have to be kept on a line by line basis.

(4) The FEPTIO application for this/these emissions unit(s), K001, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. 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 SCREEN3, 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 is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "**X**" hours per day and "**Y**" 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: **M-Xylene**

TLV (mg/m3): **435**

Maximum Hourly Emission Rate (lbs/hr): **8.38**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **94.07**

MAGLC (ug/m3): **10,357**

The permittee, has demonstrated that emissions of M-Xylene, from emissions unit(s) K001, 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).

(5) 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", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(6) 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. 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

(7) 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.

(8) 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.

(9) 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.

(10) 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.

(11) 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.

(12) 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.

(13) 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.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

(3) 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. the rolling, 12-month zinc rich primer coating usage limitation;

ii. the rolling, 12-month extreme performance coating usage limitation;

iii. the rolling, 12-month cleanup usage limitation;

iv. the rolling, 12-month VOC emission limitation;

v. the rolling, 12-month total individual HAP emission limitation;

vi. the rolling, 12-month total combined HAP emissions limitation; and

vii. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

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).

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

(5) The permittee shall include 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, in the annual Permit Evaluation Report (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 section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

Visible particulate emissions from any stack serving this emissions unit shall not exceed twenty percent opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method(s)

If required, compliance with the visible emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B).

b. Emission Limitation

The VOC content of each extreme performance coating shall not exceed 3.5 lbs/gal, exluding water and exempt solvents.

Applicable Compliance Method(s)

Compliance shall be determined by the recordkeeping in Section d)(2). Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

c. Emission Limitation

The VOC content of each zinc rich primer coating shall not exceed 4.0 lbs/gal, excluding water and exempt solvents.

Applicable Compliance Method(s)

Compliance shall be determined by the recordkeeping in Section d)(2). Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

d. Emission Limitation for K001 and K003 combined

VOC emissions for K001 and K003 combined from the application of coatings and cleanup/solvent materials shall not exceed 83.86 tons per rolling, 12-month period.

Applicable Compliance Method(s)

Compliance shall be determined by the recordkeeping in Section d)(3)k. and l.

e. Emissions Limitation for K001 and K003

Individual HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001 and K003 combined shall not exceed 9.9 tons per rolling, 12-month period.

Combined HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001 and K003 shall not exceed 24.9 tons per rolling, 12-month period.

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in Section d)(3)m.-n.

g) Miscellaneous Requirements

(1) None.

2. K003

Operations, Property and/or Equipment Description:

Spray Paint Booth, bake oven, and still used for recovery of paint equipment cleaning solvent

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)g., d)(4) – (8), and e)(5)

(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)f., b)(2)b. – d., c)(3) – (5), and d)(2)

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) [Established by PTI 01-6792, issued final 9/24/1997]	Volatile organic compound (VOC) emissions shall not exceed 120 pounds per hour (lbs/hr). The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(A), 3745-17-11(C), 3745-21-09(U)(1)(b), and 3745-21-09(U)(1)(c). See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed twenty percent opacity, as a six minute average, except as provided by rule.
c.	OAC rule 3745-17-11(C)	See c)(1) and (2) and d)(9)-(13)
d.	OAC rule 3745-21-09(U)(1)(b)	The VOC content of the zinc rich primer coatings shall not exceed 4.0 pounds per

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		gallon (lbs/gal), excluding water and exempt solvents.
e.	OAC rule 3745-21-09(U)(1)(c)	The VOC contents of the extreme performance coatings shall not exceed 3.5 lbs/gal, excluding water and exempt solvents.
f.	OAC rule 3745-31-05(D) [Synthetic Minor to avoid Title V and MACT]	See b)(2)b. – b)(2)d. and c)(3)-(5)
g.	ORC 3704.03(F) and OAC rule 3745-114	See d)(4) – (8), and e)(5)

(2) Additional Terms and Conditions

a. The hourly VOC emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, monitoring, recordkeeping, or reporting requirements are not necessary to ensure compliance with this emission limitation.

b. VOC emissions from all coatings, thinners, and cleanup materials employed in K001 and K003 combined shall not exceed 83.86 tons per rolling, 12-month period.

c. Individual hazardous air pollutant (HAP) emissions from all coatings, thinners, and cleanup materials employed in emissions units K001 and K003 combined, shall not exceed 9.9 tons per rolling, 12-month period.

d. Combined HAP emissions from all coatings, thinners, and cleanup materials employed in emissions units K001 and K003 combined, shall not exceed 24.9 tons per rolling, 12-month period.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

(3) The maximum annual coating usage for emissions units K001 and K003 shall not exceed 43,691 gallons of Extreme Performance Coatings, with a maximum VOC content of 3.5 pounds per gallon, and 500 gallons for Zinc Rich Primer, with a maximum VOC

content of 4.0 pounds per gallon, based upon a rolling 12-month summation of coating usage figures.

(4) The maximum annual cleanup material usage for emissions unit K001 shall not exceed 600 gallons, based upon a rolling 12-month summation of the cleanup/solvent material usage figures.

(5) The maximum annual cleanup material usage for emissions unit K003 shall not exceed 1,200 gallons, based upon a rolling 12-month summation of the cleanup/solvent material usage figures.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records and document any time period when the dry filtration system was not in service when the emissions unit was in operation.

(2) The permittee shall collect and record the following information each month for the paint line:

a. the name and identification of each coating;

b. whether each coating is an extreme performance coating or a zinc rich primer coating; and

c. the VOC content of each coating (excluding water and exempt solvents) in pounds per gallon, as applied.

(3) The permittee shall collect and record the following information each month for emissions units K001 and K003:

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

b. the VOC content of each coating, as applied;

c. the individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from c);

e. the number of gallons of each coating employed;

f. the name and identification of each cleanup/solvent material employed;

g. the VOC content of each cleanup/solvent material employed;

h. the individual HAP content of each HAP of each cleanup/solvent material in pounds of individual HAP per gallon cleanup/solvent material, as applied;

i. the total combined HAP content of each cleanup/solvent material in pounds of combined HAPs per gallon of cleanup/solvent material, as applied (sum of all individual HAP contents from h.);

j. the number of gallons of each cleanup/solvent material employed;

k. the total VOC emissions from all coating, in pounds or tons per rolling, 12-month period (the sum of b. times e. for each coating);

l. the total VOC emissions from all cleanup/solvent materials, in pounds or tons per rolling, 12-month period (the sum of g. times j. for each cleanup/solvent material);

m. the total individual HAP emissions for each HAP from all coating and cleanup/solvent material in pounds or tons per rolling, 12-month period (for each HAP the sum of c. times e. for each coating and the sum of h. times j. for each cleanup/solvent material); and

n. The total combined HAP emissions from all coating and cleanup/solvent materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of d. times e. for each coating plus the sum of i. times j. for each cleanup/solvent material).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting you Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvent contained in the interior coatings or clean materials. This information does not have to be kept on a line by line basis.

(4) The FEPTIO application for this/these emissions unit(s), K003, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. 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 SCREEN3, 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 is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "**X**" hours per day and "**Y**" 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):

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

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: **M-Xylene**

TLV (mg/m3): **435**

Maximum Hourly Emission Rate (lbs/hr): **1.35**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **9.18**

MAGLC (ug/m3): **10,357**

The permittee, has demonstrated that emissions of M-Xylene, from emissions unit(s) K001, 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).

(5) 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", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(6) 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. 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

(7) 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.

(8) 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.

(9) 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.

(10) 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.

(11) 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.

(12) 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.

(13) 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.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

(3) 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. the rolling, 12-month zinc rich primer coating usage limitation;

ii. the rolling, 12-month extreme performance coating usage limitation;

iii. the rolling, 12-month cleanup usage limitation;

iv. the rolling, 12-month VOC emission limitation;

v. the rolling, 12-month total individual HAP emission limitation;

vi. the rolling, 12-month total combined HAP emissions limitation; and

vii. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

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).

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

(5) The permittee shall include 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, in the annual Permit Evaluation Report (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 section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

VOC emissions from coatings shall not exceed 120 lbs/hr

Applicable Compliance Method(s)

The hourly emission limitation was developed by multiplying the maximum hourly coating throughput of 30 gallons/hour by the maximum VOC content of 4.0 lbs/gallon. Therefore, compliance with this emission limitation can be assumed provided the permittee complies with the applicable VOC content limitations for the coatings.

If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A.

b. Emission Limitation

Visible particulate emissions from any stack serving this emissions unit shall not exceed twenty percent opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method(s)

If required, compliance with the visible emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B).

c. Emission Limitation

The VOC content of each extreme performance coating shall not exceed 3.5 lbs/gal, exluding water and exempt solvents.

Applicable Compliance Method(s)

Compliance shall be determined by the recordkeeping in Section d)(3). Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

d. Emission Limitation

The VOC content of each zinc rich primer coating shall not exceed 4.0 lbs/gal, exluding water and exempt solvents.

Applicable Compliance Method(s)

Compliance shall be determined by the recordkeeping in Section d)(3). Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

e. Emission Limitation for K001 and K003

VOC emissions for K001 and K003 combined from the application of coatings and cleanup/solvent materials shall not exceed 83.86 tons per rolling, 12-month period.

Applicable Compliance Method(s)

Compliance shall be determined by the recordkeeping in Section d)(3)k. and l.

f. Emissions Limitation for K001 and K003

Individual HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001 and K003 combined shall not exceed 9.9 tons per rolling, 12-month period.

Combined HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001 and K003 shall not exceed 24.9 tons per rolling, 12-month period.

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in Section d)(3)m.-n.

g) Miscellaneous Requirements

(1) None.

3. P002, Shotblaster

Operations, Property and/or Equipment Description:

Wheelabrator horizontal plate and structural descaler with baghouse

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

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

a. None.

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

a. 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) Established by PTI 01-2249	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B).
b.	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 lb/hr based on Table 1.
c.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by the rule.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 2.0 to 6.0 inches of water.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the pressure drop readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by

the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

(1) 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.

(2) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in a. (above) where a prompt investigation was not conducted;

d. each incident of deviation described in a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of 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. <u>Emission Limitation</u>:

Visible PE from any stack shall not exceed 20% opacity, as a six-minute average except as provided by the rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)

b. Emission Limitation:

PE shall not exceed 0.551 lb/hr

Applicable Compliance Method:

If required, compliance with the PE limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

(1) None.