Ohio Environmental Protection Agency

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

8/10/2016

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

David Likens
Paladin Attachments
2800 N. Zeeb Road
Dexter, MI 48130

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

Facility ID: 1677011077
Permit Number: P0121334
Permit Type: OAC Chapter 3745-31 Modification
County: Summit

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, Akron Beacon Journal. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page,www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street Suite 700
PO Box 1049
Columbus, Ohio 43216-1049

and

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313

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 Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
ARAQMD; Pennsylvania; West Virginia; Canada

Permit Strategy Write-Up

1. Check all that apply:

   XSynthetic Minor Determination

   Netting Determination

2. Source Description:

   Paladin Attachments LLC, located in Summit County, OH, operates a miscellaneous metal parts coating line to paint heavy construction equipment scoops and buckets with air-dried coatings.

3. Facility Emissions and Attainment Status:

   Since final issuance of Permit to Install (PTI) #16-01693, issued final December 17, 1997, Paladin Attachments has been a synthetic minor Title V (SMTV) source of volatile organic compounds (VOC) and hazardous air pollutants (HAP). Summit County is in attainment for all criteria air contaminants except ozone, which is in marginal non-attainment.

4. Source Emissions:

   Paladin Attachments proposes to increase production, while remaining a SMTV source of VOC and HAP emissions to avoid Title V program requirements. To achieve their goal, Paladin Attachments will modify the current synthetic minor strategy established in PTI 16-01693 by restricting VOC, individual and combined HAP material usage to no more than, respectively, 36 tons per year, 9.9 tons per year and 24.9 tons per year, based upon a rolling, 12-month summation of the monthly material usages. It is assumed what is used is emitted. Based on the application, this facility is not subject to any GACT/MACT requirements.

5. Conclusion:

   If Paladin Attachments does not compromise the proposed modified synthetic minor strategy, then the facility should continue to avoid the Title V program.

6. Please provide additional notes or comments as necessary:

   None

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

Pollutant	Tons Per Year
VOC	36
Individual HAP	9.9
Combined HAP	24.9

PUBLIC NOTICE

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

Draft Air Pollution Permit-to-Install and Operate OAC Chapter 3745-31 Modification
Paladin Attachments

820 GLASER PARKWAY,, Akron, OH 44306
ID#:P0121334
Date of Action: 8/10/2016
Permit Desc:Chapter 31 modification permit for a heavy equipment metal parts coating line. The updated booth has increased coating throughput from 1.5 to 2 gallons per hour. The volatile organic compound emission limitation is to be raised from 30 to 36 tons per year. There are no changes to the hazardous air pollutant or particulate matter emission limitations..
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: Chris Radcliffe, Akron Regional Air Quality Management District, 1867 West Market St., Akron, OH 44313. Ph: (330)375-2480

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Paladin Attachments

Facility ID:	1677011077
Permit Number:	P0121334
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	8/10/2016
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
Paladin Attachments

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Authorization

Facility ID:	1677011077
Application Number(s):	A0056507
Permit Number:	P0121334
Permit Description:	Chapter 31 modification permit for a heavy equipment metal parts coating line. The updated booth has increased coating throughput from 1.5 to 2 gallons per hour. The volatile organic compound emission limitation is to be raised from 30 to 36 tons per year. There are no changes to the hazardous air pollutant or particulate matter emission limitations.
Permit Type:	OAC Chapter 3745-31 Modification
Permit Fee:	$200.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	8/10/2016
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:

Paladin Attachments
820 GLASER PARKWAY
Akron, OH 44306

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:

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

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: P0121334
Permit Description: Chapter 31 modification permit for a heavy equipment metal parts coating line. The updated booth has increased coating throughput from 1.5 to 2 gallons per hour. The volatile organic compound emission limitation is to be raised from 30 to 36 tons per year. There are no changes to the hazardous air pollutant or particulate matter emission limitations.

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

Emissions Unit ID:	**K001**
Company Equipment ID:	Paint Spray Booth
Superseded Permit Number:	P0108000
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 Akron Regional Air Quality Management District 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, Paint Spray Booth

Operations, Property and/or Equipment Description:

Heavy equipment metal part coating booth

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)d, b)(2)a, and c)(7) through c)(12).

(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)b, c)(3) through c)(6).

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)	Monthly volatile organic compound (VOC) emissions from coatings and cleanup materials shall not exceed 3.0 tons per month as a rolling 12-month average. See b)(2)a below.
b.	OAC rule 3745-31-05(D) (to avoid Title V requirements)	Annual emissions shall not exceed the following, as a rolling 12-month summation of the monthly emission rates from coating and cleanup materials: 36 tons per year of VOCs; 9.9 tons per year of any individual hazardous air pollutant (HAP); and 24.9 tons per year of total combined HAPs. See b)(2)a and c)(3) through c)(6) below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-11(C)	The surface coating process emission unit shall be controlled by a dry particulate filter. See c)(1) and c)(2) below.
d.	OAC 3745-21-26 Compliance required by 10/15/2016	See b)(2)b and c)(7) through c)(12) below.
e.	OAC rule 3745-21-09(U)(1)(d)	See b)(2)c and b)(2)d below.

(2) Additional Terms and Conditions

a. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-monthsummation of the emissions, upon issuance of this permit.

b. VOC content of coatings shall not exceed 3.5 pounds VOC per gallon of coating, excluding water and exempt compounds, as applied, when air dried for extreme performance metal coatings as defined in OAC 3745-21-01.

Additional coating types as defined in OAC 3745-21-01 should be compared to OAC 3745-21-26(C)(1) tables 1-5 to identify applicable VOC content limits for an uncontrolled emission unit.

c. The coating VOC limit imposed in OAC rule 3745-21-09(U)(1)(d) applies until U.S. EPA approves OAC rule 3745-21-26 as part of the Ohio State Implementation Plan (SIP).

d. No owner or operator of a miscellaneous metal parts or product coating line may cause, allow, or permit the discharge into ambient air VOC emissions from such coating line in excess of 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.

c) Operational Restrictions

(1) The permittee shall operate the dry particulate filtration system for the control of particulate emissions whenever the emissions unit is in operation and shall maintain the dry particulate filters 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 dry particulate filtration system(s) is/are 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) Prior to the use of any coating in this coating line, the permittee shall determine that the coating meets the toxic screening criteria described below.

Purpose: The purpose of this test is to evaluate coatings to determine if the chemical compounds in the coatings would be emitted at acceptable levels for the general permit.

Data Needed: (1) MSDS sheet for each coating to be evaluated. (2) Information on the maximum coating usage rate for the line as discussed in Step 1 below.

Step 1. Using the following factors, calculate the maximum coating usage rate in terms of gallons per hour:

a. Assume the coating line operates at its maximum speed while still making usable product.

b. Assume the coating line is operating at its largest coating laydown rate. This would typically be accomplished by assuming the coating line is painting the largest part available.

Step 2. Review the material safety data sheet (MSDS) for the coating. Note each chemical compound listed its TLV and the percent by weight of the chemical compound in the coating.

Step 3. Determine if any of the chemical compounds listed in the MSDS are also listed in the following table. If any of the chemical compounds are listed in the table, then calculate the maximum annual emission of that compound by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. Then multiply the result by 8760 hours per year. The result will be in pounds per year. Check to see if the calculated emission rate is less than the allowable emission rate found in the below table. If all of the compounds emitted have a maximum annual emissions of less than the allowed rate, then move on to step 4. If any of the compounds are emitted at a rate higher than the allowed emission rate, then contact your appropriate District Office or local air agency contact to determine if you can use the coating.

Chemical Compound	CAS	Molecular Weight (MW)	Allowed Emission Rate (lb/year)
arsenic compounds, as As	7440-38-2	74.92	1.7
benzene	71-43-2	78.11	1100
benzidine	92-87-5	184.23	5.6
benzo(a)pyrene	50-32-8	252.3	6.9
beryllium (and Be compounds)	7440-41-7	9.01	0.35
cadmium	7440-43-9	112.4	5.2
chromium	7440-47-3	varies	0.69
hexachlorobenzine (HCB)	118-74-1	289.78	35
mercury (and Hg compounds)	7439-97-6	200.59	0.1
nickel (Ni subsulfide)	12035-72-2	240.19	17

Chemical Compound	CAS	Molecular Weight (MW)	Allowed Emission Rate (lb/year)
polychlorinated dibenzo-p-dioxins	1746-01-6	varies	0.03
polychlorinated dibenzofurans	132-64-9	varies	0.03
polychlorinated biphenyls (PCBs, aroclors)	1336-36-3	varies	87
vinyl chloride	75-01-4	62.5	2000

Step 4. Find all of the chemical compounds in the coating that have a listed American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Value (TLV). For each chemical compound with a listed TLV (other than those in the above table), calculate the maximum short-term emission rate by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. The result should be in terms of pounds of the chemical compound per hour.

Step 5. Determine if the compound will be emitted at or below the acceptable rate. This is done by searching the following table for the chemical compound's TLV and then determining the maximum allowed emission rate listed in the below table. (Note. If the TLV is listed as ppm, then convert the TLV to $\mu g/m^3$by using the following formula: (TLV in ppm)x(MW)x(1000)/24.45 = TLV in $\mu g/m^3$; where MW is the molecular weight of the compound.) This table lists the allowable emission rates for compounds with a TLV between the high range and low range. Compare the maximum calculated short-term emission rate of each chemical compound to the allowed emission rate in the table. If the maximum emission rate is less than the allowed emission rate, then the chemical compound is emitted at an acceptable rate.

TLV Range ($\mu g/m^3$)		Allowed Emission Rate
Low	High	(lb/hr)
1	15	6.7E-05
15	30	0.001
30	60	0.002
60	120	0.004
120	240	0.008
240	480	0.016
480	960	0.032
960	1,920	0.064
1,920	3,840	0.128
3,840	7,680	0.256
7,680	15,360	0.512
15,360	30,720	1.02
30,720	61,440	2.05
61,440	122,880	4.1
122,880	245,760	8.19

TLV Range ($\mu g/m^3$)		Allowed Emission Rate
Low	High	(lb/hr)
45,760	491,520	16.4
91,520	983,040	32.8
983,040	1,966,080	65.5
1,966,080	3,932,160	131

Step 6. Check each chemical compound that has a listed TLV. If all compounds are emitted at a rate less than the allowed emission rate, then the coating passes the toxic screening test and can be used under this permit. If one or more of the chemical compounds are emitted at a rate greater than the allowed emission rate, then you should contact your appropriate District Office or local air agency contact to determine if you can use the coating.

(4) The maximum annual VOC material usage* from coatings and cleanup materials shall not exceed 36 tons, based upon a rolling, 12-month summation of the VOC material usage rates.

*Annual VOC material usage rate is equivalent to an annual VOC emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

(5) The maximum annual individual HAP material usage** from coatings and cleanup materials shall not exceed 9.9 tons, based upon a rolling, 12-month summation of the individual HAP material usage rates.

**Annual individual HAP material usage rate is equivalent to an annual individual HAP emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

(6) The maximum annual combined HAP material usage rate*** from coatings and clean up materials shall not exceed 24.9 tons, based upon a rolling, 12-month summation of the combined HAP material usage rates.

***Annual combined HAP material usage rate is equivalent to an annual combined HAP emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

(7) One, or a combination, of the following application methods shall be used for coating application:

a. Electrostatic equipment.

b. High volume low pressure (HVLP) spray equipment.

c. Flow coating.

d. Roller coating.

e. Dip coating, including electrodeposition.

f. Airless spray.

g. Air-assisted airless spray.

h. Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying.

(8) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(9) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

(10) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(11) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one location to another in closed containers or pipes.

(12) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

(13)

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the results of any toxic screening evaluations performed per c)(3) above.

(2) The permittee shall collect and record the following information each day:

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

b. The VOC content (excluding water and exempt solvents) of each coating, as applied.

c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.

d. The daily, volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

(3) The permittee shall collect and record the following information each month to determine the total VOC material usage and emissions:

a. the name and identification number of each coating and cleanup material employed;

b. the weight, in pounds per month, of each coating, as applied;

c. the weight, in pounds per month, of each cleanup material, as applied;

d. the VOC content of each coating, as applied, in percent by weight;

e. the VOC content of each cleanup material, as applied, in percent by weight;

f. the total VOC material usage of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

g. the total VOC material usage of all cleanup materials, as applied, in pounds per month, i.e., g = sum[c x e] for all cleanup materials;

h. the total VOC material usage of all coatings and cleanup materials, as applied, in tons per month, i.e. h = [f + g]/2000;

i. the total VOC emissions from all coatings and cleanup materials, as applied, in tons per month, i.e. i = h, since emissions rate equals usage rate;

j. the rolling, 12-month total VOC material usage rates of all coatings and cleanup materials, as applied, in tons per year;

k. the rolling, 12-month total VOC emissions rates from all coatings and cleanup materials, as applied, in tons per year, i.e. k = j, since emissions rate equals usage rate; and

l. The rolling, 12-month average monthly VOC emissions rates from all coatings and cleanup materials, as applied, in tons per month, i.e. l = k/12.

(4) The permittee shall collect and record the following information each month to determine the individual HAP material usages and emissions:

a. the name and identification number of each coating and cleanup material employed;

b. the weight, in pounds per month, of each coating, as applied;

c. the weight, in pounds per month, of each cleanup material, as applied;

d. the individual HAP content for each HAP of each coating, as applied, in percent by weight;

e. the individual HAP content for each HAP of each cleanup material, as applied, in percent by weight;

f. the total individual HAP material usage for each HAP of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

g. the total individual HAP material usage for each HAP of all cleanup materials, as applied, in pounds per month, i.e., g = sum[c x e] for all cleanup materials;

h. the total individual HAP material usage for each HAP of all coatings and cleanup materials, as applied, in tons per month, i.e., h = [f + g]/2000;

i. the total individual HAP emissions for each HAP from all coatings and cleanup materials, as applied, in tons per month, i.e., i = h, since emissions rate equals usage rate;

j. the rolling, 12-month individual HAP material usage rates for each HAP of all coatings and cleanup materials, as applied, in tons per year; and

k. the rolling, 12-month summation individual HAP emissions rates for each HAP from all coatings and cleanup materials, as applied, in tons per year, i.e., k = j, since emissions rate equals usage rate.

(5) The permittee shall collect and record the following information each month to determine the combined HAP material usages and emissions:

a. the name and identification number of each coating and cleanup material employed;

b. the weight, in pounds per month, of each coating, as applied;

c. the weight, in pounds per month, of each cleanup material, as applied;

d. the combined HAP content of each coating, as applied, in percent by weight;

e. the combined HAP content of each cleanup material, as applied, in percent by weight;

f. the total combined HAP material usage of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

g. the total combined HAP material usage of all cleanup materials, as applied, in pounds per month, i.e., g = sum[c x e] for all cleanup materials;

h. the total combined HAP material usage of all coatings and cleanup materials, as applied, in tons per month, i.e., h = [f + g]/2000;

i. the total combined HAP emissions from all coatings and cleanup materials, as applied, in tons per month, i.e., i = h, since emissions rate equals usage rate;

j. the rolling, 12-month combined HAP material usage rates of all coatings and cleanup materials, as applied, in tons per year; and

k. the rolling, 12-month combined HAP emissions rates from all coatings and cleanup materials, as applied, in tons per year, i.e., k = j, since emissions rate equals usage rate.

(6) 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.

(7) 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.

(8) 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.

(9) 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.

(10) 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 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.

(3) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing that the dry particulate filter was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the event occurs.

(4) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing a daily, volume-weighted average VOC content of all the coatings, as applied, greater than 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coatings. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the exceedance occurs.

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

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. VOC emissions from coatings and cleanup materials shall not exceed 36 tons per year, as a rolling, 12-month summation of the monthly emission rates;

ii. individual hazardous air pollutant (HAP) emissions from coatings and cleanup materials shall not exceed 9.9 tons per year, as a rolling, 12-month summation of the monthly emission rates;

iii. combined hazardous air pollutant (HAP) emissions from coatings and cleanup materials shall not exceed 24.9 tons per year, as a rolling, 12-month summation of the monthly emission rates; and

iv. 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).

(6) The permittee shall submit a letter of certification of compliance with OAC section 3745-21-26, as described in OAC rule 3745-21-26(I)(3).

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emissions Limitations:

Monthly VOC emissions from coatings and cleanup materials shall not exceed 3.0 tons per month as a rolling 12-month average.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(4) above.

b. Emissions Limitations:

Annual emissions shall not exceed the following, as a rolling 12-month summation of the monthly emission rates from coating and cleanup materials:

36 tons per year of VOCs;

9.9 tons per year of any individual hazardous air pollutant (HAP); and

24.9 tons per year of total combined HAPs.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(4), d)(5), and d)(6) above, respectively.

c. Emissions Limitations:

VOC content of coatings shall not exceed 3.5 pounds VOC per gallon of coating, excluding water and exempt compounds, as applied, when air dried for extreme performance metal coatings as defined in OAC 3745-21-01.

No owner or operator of a miscellaneous metal parts or product coating line may cause, allow, or permit the discharge into ambient air VOC emissions from such coating line in excess of 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.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(3) above.

(2) In accordance with OAC rule 3745-21-04(B)(5), facilities located in Summit County shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

g) Miscellaneous Requirements

(1) None.