Ohio Environmental Protection Agency

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

8/22/2016

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

Alan McAdams
TRUTEC INDUSTRIES, INC.
4795 UPPER VALLEY PK.
URBANA, OH 43078

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0511010106
Permit Number: P0120272
Permit Type: Renewal
County: Champaign

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

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

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

If you have any questions regarding your permit, please contact Ohio EPA DAPC, Southwest District Office at (937)285-6357 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

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

Cc: Ohio EPA-SWDO

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
TRUTEC INDUSTRIES, INC.

Facility ID:	0511010106
Permit Number:	P0120272
Permit Type:	Renewal
Issued:	8/22/2016
Effective:	8/22/2016
Expiration:	8/22/2021

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
TRUTEC INDUSTRIES, INC.

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Authorization

Facility ID:	0511010106
Application Number(s):	A0054993
Permit Number:	P0120272
Permit Description:	FEPTIO Renewal permit for a coatings facility.
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	8/22/2016
Effective Date:	8/22/2016
Expiration Date:	8/22/2021

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

This document constitutes issuance to:

TRUTEC INDUSTRIES, INC.
4795 UPPER VALLEY PK.
URBANA, OH 43078

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0120272
Permit Description: FEPTIO Renewal permit for a coatings facility.

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:	main e-coat line
Superseded Permit Number:	P0107648
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	solid lube spray coating booth
Superseded Permit Number:	P0107648
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K005**
Company Equipment ID:	coating repair spray booth
Superseded Permit Number:	P0107648
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K006**
Company Equipment ID:	small parts e-coat line
Superseded Permit Number:	P0107648
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K007**
Company Equipment ID:	gecom tumbler
Superseded Permit Number:	P0107648
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K008**
Company Equipment ID:	cylinder paint machine
Superseded Permit Number:	P0107648
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P004**
Company Equipment ID:	hydrophilic mixing tank, 300 gallon
Superseded Permit Number:	P0107648
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) 2., 3., and 4.

2. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, K005 thru K008, and P004 shall be less than 10.0 tons for any single HAP and 25.0 tons for any combination of HAPs, based on rolling, 12-month summations.

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

   a) the company identification for each HAP-emitting material (i.e., all HAP-containing coatings, clean-up materials, resins, adhesives, potting compounds, plating chemicals, etc.);

   b) the individual HAP content of each HAP emitting material;

   c) the total combined HAP content of each HAP emitting material (i.e. sum of individual HAP contents from b);

   d) the amount of each HAP emitting material employed;

   e) the hours of operation, or other emissions determining rationale, of individual HAP-generating sources (e.g., fuel combustion, sanding/grinding operations, plating);

   f) the amount of combined HAP emitting material employed;

   g) the total individual HAP emissions from all HAP-emitting materials employed (b times d) and all HAP-generating sources, in pounds or tons per month (summation of the e);

   h) the hours of operation, or other emissions determining rationale, of combined HAP-generating sources (e.g., fuel combustion, sanding/grinding operations, plating);

   i) the total combined HAP emissions from all HAP emitting materials employed (c times f) and all combined HAP-generating sources, in pounds or tons per month (summation of the h);

   j) the rolling, 12-month summation of individual HAP emissions from all HAP-emitting materials employed (summation of g) and all individual HAP-generating sources (summation of g), in tons; and

k) the rolling, 12-month summation of total combined HAP emissions from all HAP-emitting materials employed (summation of i) and all HAP-generating sources, in tons (summation of i).

4. The permittee shall submit quarterly deviation (excursion) reports for the following emissions unit(s) that identify:

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

      (1) The rolling 12 individual HAP emissions is equal to/or greater than 10.0 tons from emissions units K001, K002, K005 thru K008, and P004; and

      (2) The rolling 12-month combined HAP's emissions are equal to/or greater than 25.0 tons from emissions units K001, K002, K005 thru K008, and P004.

   b) the probable cause of each deviation (excursion);

   c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

   d) the magnitude and duration of each deviation (excursion).

   If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

   The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

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

a) Emission Limitation:

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

Applicable Compliance Method:

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

C. Emissions Unit Terms and Conditions

1. K001, Main e-coat line

Operations, Property and/or Equipment Description:

Main e-coat line, electrodeposition coating tank and drying oven.

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)(5), d)(6) and d)(7) below.

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) content of the resin material employed in this emissions unit shall not exceed 0.5 lbs/gal, as employed. The VOC content of the paste material employed in this emissions unit shall not exceed 2.0 lbs/gal, as employed. Organic compound (OC) emissions from cleanup materials shall not exceed 6.52 TPY. Visible particulate emissions (PE) from the stack shall not exceed 5% opacity. Emissions from natural gas combustion in the drying oven shall not exceed: 0.22 lb/hr and 0.95 TPY for NOx

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.18 lb/hr and 0.79 TPY for CO 0.004 lb/hr and 0.018 TPY for PE 0.02 lb/hr and 0.053 TPY for VOC 0.001 lb/hr and 0.006 TPY for SO2. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(E).
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V for HAP and the requirement of 40 CFR Part 63 Subpart MMMM, "National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products").	See 1.b)(1) of Section B.
c.	OAC rule 3745-31-05(E) (Voluntary limit to minimize emissions from this emissions unit)	The VOC emissions from all resins and pastes employed in this emissions unit shall not exceed 20.57 tons per rolling 12-month period. See c)(1) and (2) below.
d.	OAC rule 3745-17-07(A)	The visible PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-18-06(A)	See b)(2)b.
f.	OAC rule 3745-21-09(U)(1)(i)	The VOC content of the coating material employed limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
g.	OAC rule 3745-114-01	Ohio Toxics Rule.

(2) Additional Terms and Conditions

a. The emission limitations for PE, SO2, NOx, CO and VOC from natural gas combustion in the drying oven are established for in this permit to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

b. OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas/LPG as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas/LPG being combusted meet certain fuel quality restrictions (a heat content greater than 950

Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas/LPG being burned in this emissions unit is the standard, pipeline quality natural gas/LPG supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

c) Operational Restrictions

(1) The maximum annual resin material usage for this emissions unit shall not exceed 56,285 gallons, based upon a rolling, 12-month summation of the resin material usage figures.

(2) The maximum annual paste material usage for this emissions unit shall not exceed 6,494 gallons, based upon a rolling, 12-month summation of the paste material usage figures.

(3) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for this emissions unit:

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

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

(2) The permittee shall maintain monthly records of the following information for this emissions unit:

a. the VOC content of each resin material, in pounds per gallon, as employed;

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

c. the rolling, 12-month summation of the resin material usage figures, in gallons;

d. the total VOC emissions from all the resin materials, in tons, i.e., summation of [(a x b)/2000] for each resin material employed;

e. the VOC content of each paste material, in pounds per gallon, as employed;

f. the volume of each paste material employed, in gallons;

g. the rolling, 12-month summation of the paste material usage figures, in gallons;

h. the total VOC emissions from all the paste materials, in tons, i.e., summation of [(e x f)/2000] for each paste material employed;

i. the total VOC emission for the resin and the paste materials employed, in tons, i.e., (d + h); and

j. the rolling, 12-month summation of the VOC emissions for this emissions unit.

(3) The permittee shall collect and record the following information each month for the purpose of determining annual OC emissions:

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

b. the OC content of each cleanup material, in pounds per gallon;

c. the number of gallons of each cleanup material employed; and

d. the total OC emissions from all cleanup materials employed, in tons, i.e., summation of [(b x c)/2000] for each cleanup material employed.

(4) For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(5) The permit to install for this emissions unit K001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl isobutyl ketone

TLV (mg/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 0.56

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 894

MAGLC (ug/m3): 4,881

(6) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

(7) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

(1) 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.

(2) 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 VOC content limitations in b)(1);

ii. the rolling, 12-month resin material usage limitation of 56,285 gallons;

iii. the rolling, 12-month paste material usage limitation of 6,494 gallons;

iv. the rolling, 12-month VOC emission limitation of 20.57 tons; and

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 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).

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

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

(5) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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. VOC Content Limitation:

The VOC content of the resin material employed in this emissions unit shall not exceed 0.5 pound per gallon, as employed.

The VOC content of the paste material employed in this emissions unit shall not exceed 2.0 pound per gallon, as employed.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined through the record keeping requirements established in section d) of this permit.

b. Emission Limitation:

The VOC emissions from all resins and pastes employed in this emissions unit shall not exceed 20.57 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance with the VOC emission limitation shall be determined through the record keeping requirements established in section d) of this permit.

c. Emission Limitation:

Organic compound (OC) emissions from cleanup materials shall not exceed 6.52 tons per year.

Applicable Compliance Method:

Compliance with the annual OC emission limitation shall be determined through the record keeping requirements established in section d) of this permit.

d. Emission Limitation:

Visible PE from the stack shall not exceed 5% opacity.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

e. Emission Limitation:

Emissions from natural gas combustion in the drying oven shall not exceed:

0.22 lb/hr and 0.95 ton/year for nitrogen oxides (NOx)

0.18 lb/hr and 0.79 ton/year for carbon monoxide (CO)

0.004 lb/hr and 0.018 ton/year for particulate emissions (PE)

0.02 lb/hr and 0.053 ton/year for VOC

0.001 lb/hr and 0.006 ton/year for sulfur dioxide (SO2)

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 5, 6, 7, 10, 25A. The emission limitations above were established by multiplying the maximum natural gas usage from the burners (2,157 cu.ft/hr) by the emission factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," AP-42, Tables 1.4-1, and 1.4-2., revised 7/98: 100 lbs NOx/mm cu. ft.; 84 lbs CO/mm cu. ft.; 1.9 lbs PM10/mm cu. ft.; 5.5 lbs VOC/mm cu. ft.; and 0.6 lb SO2/mm cu. ft. The annual emissions were established by multiplying the maximum hourly natural gas usage by the appropriate emission factor, then multiplying the result by 8,760 hours per year, and dividing the result by 2000 lbs/ton.

f. Emission Limitation:

0.020 lb PE/mmBtu of actual heat input (for the drying oven)

Applicable Compliance Method:

when burning only natural gas. If required, the permittee shall demonstrate compliance with the PE limitation through emission tests performed in accordance with OAC rule 3745-17-03(B)(9).

g. VOC Content Limitation:

The VOC content of the coating material employed in this emissions unit shall not exceed 3.0 pounds per gallon, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined through the record keeping requirements established in section d) of this permit.

h. Emission Limitation:

VOC emissions shall not exceed 20.57 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the record keeping requirements established in section d) of this permit.

i. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

g) Miscellaneous Requirements

(1) None.

2. K002, Solid lube spray coating booth

Operations, Property and/or Equipment Description:

Solid lube spray coating booth with bake ovens

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. b)(1)b., b)(1)c., c)(3), c)(4), d)(2), and e)(2) below.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) content of the coatings employed in this emissions unit shall not exceed 8.0 lbs/gal, as applied. The VOC content of the cleanup materials employed in this emissions unit shall not exceed 8.58 lbs/gal, as employed. Particulate emissions (PE) shall not exceed 0.2 lbs/hr or 0.88 TPY from coating activities. Visible PE from the stack shall not exceed 5% opacity. Emissions from natural gas combustion in the bake ovens shall not exceed:

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.04 lb/hr and 0.175 TPY for NOx 0.03 lb/hr and 0.144 TPY for CO 0.001 lb/hr and 0.004 TPY for PE 0.002 lb/hr and 0.009 TPY for VOC 0.0002 lb/hr and 0.001 TPY for SO2. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(E).
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V for HAP and the requirement of 40 CFR Part 63 Subpart MMMM, "National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products").	See 1.b)(1) of Section B.
c.	OAC rule 3745-31-05(E) (Voluntary limit to minimize emissions from this emissions unit)	VOC emissions shall not exceed 14.81 tons per rolling, 12-month summation.
d.	OAC rule 3745-17-07(A)	The visible PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule3745-31-05(A)(3).
e.	OAC rule 3745-17-10(B)	0.020 lb PE/mmBtu of actual heat input (for the bake ovens).
f.	OAC rule 3745-17-11(B)(2)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule3745-31-05(A)(3).
g.	OAC rule 3745-18-06(A)	See b)(2)b.
h.	OAC rule 3745-21-09(U)(2)(e)	Coating usage shall not exceed 10 gallons per day.

(2) Additional Terms and Conditions

a. The 0.2 lb PE per hour limitation from coating activities and the emission limitations for PE, SO2, NOx, CO and VOC from natural gas combustion in the bake ovens are established to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

b. OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas/LPG as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas/LPG being combusted meet certain fuel quality restrictions (a heat content greater than 950

Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas/LPG being burned in this emissions unit is the standard, pipeline quality natural gas/LPG supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

(2) The permittee shall employ fabric filters as a control system for PE whenever this emissions unit is in operation.

(3) The maximum annual coating usage for this emissions unit shall not exceed 3,650 gallons based upon a rolling, 12-month summation of the resin material usage figures.

(4) The maximum annual cleanup material usage for this emissions unit shall not exceed 1,643 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records of the following for this emissions unit:

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

b. the volume, in gallons, of each coating employed; and

c. the total volume, in gallons, of all of the coatings employed.

(2) The permittee shall maintain monthly records of the following for this emissions unit:

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

b. the volume of each coating, as applied, in gallons;

c. the rolling, 12-month summation of the coating usage figures, in gallons;

d. the VOC emissions for all coatings employed, in tons, i.e., summation of (a x b) for each coating employed divided by 2000 lbs/ton;

e. the name and identification of each cleanup material employed;

f. the volume, in gallons, of each cleanup material employed;

g. the rolling, 12-month summation of the cleanup material usage figures, in gallons;

h. the VOC content, in pounds per gallon, of each cleanup material employed;

i. the VOC emissions for all the cleanup materials employed, prior to any credit for recovered materials, in tons, i.e., summation of (f x h) for each cleanup material employed divided by 2000 lbs/ton;

j. the date the recovery tank was emptied;

k. the date the materials from the recovery tank were shipped off site;

l. the amount materials from the recovery tank that were shipped off site, in gallons;

m. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material (a composite sample of all drums is acceptable for purposes of this requirement);

n. the VOC from recovered materials, to be credited against the total VOC emissions from the cleanup materials employed, in tons, i.e., summation of (l x m) for each shipment divided by 2000 lbs/ton;

o. the net VOC emissions for all the cleanup materials employed, in tons, i.e., (i - n);

p. the total VOC emissions from both the coatings and the cleanup materials employed, in tons, i.e., (d + o); and

q. the rolling, 12-month summation of the total VOC emissions for this emissions unit.

(3) For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(4) The permittee shall maintain records that document any time periods when the fabric filter control system serving this emissions unit is not in service while this emissions unit is operating.

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. 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 45 days after the exceedance occurs.

(2) 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 VOC content limitations in b)(1);

ii. the rolling, 12-month coating usage limitation of 3,650 gallons;

iii. the rolling, 12-month cleanup material usage limitation of 1,643 gallons;

iv. the rolling, 12-month VOC emission limitation of 14.81 tons; and

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 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).

(3) 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.

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

(5) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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. VOC Content Limitation:

8.0 lbs VOC per gallon of coating, as applied

8.58 lbs VOC per gallon of cleanup material, as employed

Applicable Compliance Method:

Compliance with the coating and cleanup material VOC content limitations shall be determined through the record keeping requirements established in Section d) of this permit.

b. Emission Limitation:

0.2 pound per hour and 0.88 tons per year PE for coating activities

Applicable Compliance Method:

To determine the actual worst-case emission rate for PE from coating activities, the following equation may be used:

E = Cs x (1 - TE) x (1 - CE)

where:

E = PE rate, in pounds per hour

Cs = maximum potential coating solids usage rate, in pounds per hour

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (25% TE, based upon "Compilation of Air Pollutant Emission Factors," AP-42, Table 4.2.2.14-1, revised 9/90)

CE = control efficiency of the fabric filter control system. (96% CE, based on manufacturer information)

If required, the permittee shall demonstrate compliance with the hourly PE limitation through emission tests performed 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).

The annual PE limitation was established by multiplying the maximum hourly PE limitation by 8,760 hours per year, and dividing the result by 2000 lbs/ton.

c. Emission Limitation:

Visible PE from the stack shall not exceed 5% opacity.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

d. Emission Limitation:

Emissions from natural gas combustion in the drying oven shall not exceed:

0.04 lb/hr and 0.175 TPY for nitrogen oxides (NOx)

0.03 lb/hr and 0.144 TPY for carbon monoxide (CO)

0.001 lb/hr and 0.004 TPY for PE

0.002 lb/hr and 0.009 TPY for VOC

0.0002 lb/hr and 0.001 TPY for sulfur dioxide (SO2)

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 5, 6, 7, 10, 25A. The emission limitations above were established by multiplying the maximum natural gas usage from the burners (393 cu.ft/hr) by the emission factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," AP-42, Tables 1.4-1, and 1.4-2., revised 7/98: 100 lbs NOx/mm cu. ft.; 84 lbs CO/mm cu. ft.; 1.9 lbs PM10/mm cu. ft.; 5.5 lbs VOC/mm cu. ft.; and 0.6 lb SO2/mm cu. ft. The annual emissions were established by multiplying the maximum hourly natural gas usage by the appropriate emission factor, then multiplying the result by 8,760 hours per year, and dividing the result by 2000 lbs/ton.

e. Emission Limitation:

0.020 lb PE/mmBtu of actual heat input (for the drying oven)

Applicable Compliance Method:

Natural gas is an inherently clean fuel, and therefore compliance with this limitation is assumed when burning only natural gas. If required, the permittee shall demonstrate compliance with the PE limitation through emission tests performed in accordance with OAC rule 3745-17-03(B)(9).

f. Emission Limitation:

VOC emissions shall not exceed 14.81 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the record keeping requirements established in section d) of this permit.

g. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

g) Miscellaneous Requirements

(1) None.

3. K005, Coating repair spray booth

Operations, Property and/or Equipment Description:

Coating repair spray 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. 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. b)(1)b., b)(1)c., c)(1), c)(2), d)(2), and e)(1) below.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Coating usage shall not exceed 3.0 gallons per day. The volatile organic compound (VOC) content of the coatings employed in this emissions unit shall not exceed 6.1 pounds per gallon, as applied. The VOC content of the cleanup materials employed in this emissions unit shall not exceed 6.8 pounds per gallon, as employed. Particulate emissions (PE) shall not exceed 0.02 pounds per hour nor 0.09 tons per year. Visible PE from the stack shall not exceed 5% opacity.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(E).
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V for HAP and the requirement of 40 CFR Part 63 Subpart MMMM, "National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products").	See 1.b)(1) of Section B.
c.	OAC rule 3745-31-05(E) (Voluntary limit to minimize emissions from this emissions unit)	VOC emissions shall not exceed 1.20 tons per rolling, 12-month summation.
d.	OAC rule 3745-17-07(A)	The visible PE emission limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11(B)(2)	The hourly PE emission limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-21-09(U)(2)(e)	The coating usage limitation established pursuant to this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The 0.02 lb PE per hour limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

c) Operational Restrictions

(1) The maximum annual coating usage for this emissions unit shall not exceed 312 gallons, based upon a rolling, 12-month summation of the coating usage figures.

(2) The maximum annual cleanup material usage for this emissions unit shall not exceed 73 gallons, based upon a rolling, 12-month summation of the coating usage figures.

(3) The permittee shall employ fabric filters as a control system for PE whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records of the following for this emissions unit:

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

b. the volume, in gallons, of each coating employed; and

c. the total volume, in gallons, of all of the coatings employed.

(2) The permittee shall maintain monthly records of the following for this emissions unit:

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

b. the VOC content of each cleanup material employed, in pounds per gallon;

c. the volume of each cleanup material employed, in gallons;

d. the rolling, 12-month summation of the cleanup material usage figures, in gallons;

e. the VOC emissions for all the cleanup materials employed, in tons, i.e., summation of [(b x c)/2000] for each cleanup material employed;

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

g. the volume of each coating, as applied, in gallons;

h. the rolling, 12-month summation of the coating usage figures, in gallons;

i. the VOC emissions for all coatings employed, in tons, i.e., summation of [(f x g)/2000] for each coating employed;

j. the sum total VOC emissions for all coating and cleanup materials, in tons, i.e., (e + i); and

k. the rolling, 12-month summation of the total VOC emissions for this emissions unit.

(3) The permittee shall maintain records that document any time periods when the fabric filter control system serving this emissions unit is not in service while this emissions unit is operating.

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. 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 45 days after the exceedance occurs.

(2) 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 VOC content limitations in b)(1);

ii. the rolling, 12-month coating usage limitation of 312 gallons;

iii. the rolling, 12-month cleanup material usage limitation of 73 gallons;

iv. the rolling, 12-month VOC emission limitation 1.2 tons; and

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 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).

(3) 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.

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

electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(5) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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. VOC Content Limitation:

6.1 lbs VOC/gallon of coating, as applied

6.8 lbs VOC per gallon of cleanup material, as employed

Applicable Compliance Method:

Compliance with the coating and cleanup material VOC content limitations shall be determined through the record keeping requirements established in d)(2) of this permit.

b. Emission Limitation:

0.020 lb PE per hour and 0.09 tons PE per year from coating activities

Applicable Compliance Method:

To determine the actual worst-case emission rate for PE, the following equation may be used:

E = Cs x (1 - TE) x (1 - CE)

where:

E = PE rate, in pounds per hour

Cs = maximum potential coating solids usage rate, in pounds per hour

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (25% TE, based upon "Compilation of Air Pollutant Emission Factors," AP-42, Table 4.2.2.14-1, revised 9/90)

CE = control efficiency of the fabric filter control system. (96% CE, based on manufacturer information)

If required, the permittee shall demonstrate compliance with the hourly PE limitation through emission tests performed 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).

The annual PE limitation was established by multiplying the maximum hourly PE limitation by 8,760 hours per year, and dividing the result by 2000 lbs/ton.

c. Emission Limitation:

Visible PE from the stack shall not exceed 5% opacity.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

d. Emission Limitation:

VOC emissions shall not exceed 1.2 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the record keeping requirements established in d)(2) of this permit.

e. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

g) Miscellaneous Requirements

(1) None.

4. K006, Small parts e-coat line

Operations, Property and/or Equipment Description:

Small parts e-coat line, electrodeposition and drying oven.

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)h., d)(4), d)(5) and d)(6).

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) content of the resin material employed in this emissions unit shall not exceed 0.5 lbs/gal, as employed. The VOC content of the paste material employed in this emissions unit shall not exceed 2.0 lbs/gal, as employed. Visible particulate emissions (PE) from the stack shall not exceed 5% opacity. Emissions from natural gas combustion in the drying oven shall not exceed: 0.25 lb/hr and 1.07 TPY for NOx 0.21 lb/hr and 0.91 TPY for CO 0.005 lb/hr and 0.02 TPY for PE 0.02 lb/hr and 0.06 TPY for VOC 0.002 lb/hr and 0.01 TPY for SO2.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V for HAP and the requirement of 40 CFR Part 63 Subpart MMMM, "National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products").	See 1.b)(1) of Section B.
c.	OAC rule 3745-31-05(E) (Voluntary limit to minimize emissions from this emissions unit)	VOC emissions shall not exceed 17.24 tons per rolling, 12-month summation.
d.	OAC rule 3745-17-07(A)	The visible PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-10(B)	0.020 lb PE/mmBtu of actual heat input (for the drying oven).
f.	OAC rule 3745-18-06(A)	See b)(2)b.
g.	OAC rule 3745-21-09(U)(1)(i)	The VOC content of the coating material employed in this emissions unit shall not exceed 3.0 pounds per gallon, excluding water and exempt solvents.
h.	OAC rule 3745-114-01	Ohio Toxics Rule.

(2) Additional Terms and Conditions

a. The emission limitations for PE, SO2, NOx, CO and VOC from natural gas combustion in the drying oven are established to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

b. OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas/LPG as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas/LPG being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas/LPG being burned in this emissions unit is the standard, pipeline quality natural gas/LPG supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

c) Operational Restrictions

(1) The maximum annual resin material usage for this emissions unit shall not exceed 47,041 gallons, based upon a rolling, 12-month summation of the resin material usage figures.

(2) The maximum annual paste material usage for this emissions unit shall not exceed 5,484 gallons, based upon a rolling, 12-month summation of the paste material usage figures.

(3) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for this emissions unit:

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

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

(2) The permittee shall maintain monthly records of the following information for this emissions unit:

a. the VOC content of each resin material, as employed;

b. the volume of resin material employed, in gallons;

c. the rolling, 12-month summation of the resin material usage figures;

d. the VOC emissions for the resin materials employed, in tons, i.e., summation of (a x b) for each resin material employed divided by 2000 lbs/ton;

e. the VOC content of each paste material, as employed;

f. the volume of paste material employed, in gallons;

g. the rolling, 12-month summation of the paste material usage figures;

h. the VOC emissions for the paste materials employed, in tons, i.e., summation of (e x f) for each paste material employed divided by 2000 lbs/ton;

i. the total VOC emissions for both the resin materials and the paste materials, in pounds or tons (d + h); and

j. the rolling, 12-month summation of the VOC emissions for this emissions unit.

(3) For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(4) The permit to install for this emissions unit K006 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl isobutyl ketone

TLV (mg/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 0.29

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 894

MAGLC (ug/m3): 4,881

(5) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not

be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

(6) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

(1) 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.

(2) 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 VOC content limitations in b)(1);

ii. the rolling, 12-month resin usage limitation of 47,041 gallons;

iii. the rolling, 12-month paste usage limitation of 5,484 gallons;

iv. the rolling, 12-month VOC emission limitation 17.24 tons; and

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 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).

(3) 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.

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

(5) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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. VOC Content Limitation:

The VOC content of the resin material employed in this emissions unit shall not exceed 0.5 pound per gallon, as employed.

The VOC content of the paste material employed in this emissions unit shall not exceed 2.0 pound per gallon, as employed.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined through the record keeping requirements established in section d) of this permit.

b. Emission Limitation:

Visible PE from the stack shall not exceed 5% opacity.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

c. Emission Limitation:

Emissions from natural gas combustion in the drying oven shall not exceed:

0.25 lb/hr and 1.07 TPY for nitrogen oxides (NOx)

0.21 lb/hr and 0.91 TPY for carbon monoxide (CO)

0.005 lb/hr and 0.02 TPY for PE

0.02 lb/hr and 0.06 TPY for VOC

0.01 lb/hr and 0.01 TPY for sulfur dioxide (SO2)

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 5, 6, 7, 10, 25A. The emission limitations above were established by multiplying the maximum natural gas usage from the burners (2,451 cu.ft/hr) by the emission factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," AP-42, Tables 1.4-1, and 1.4-2., revised 7/98: 100 lbs NOx/mm cu. ft.; 84 lbs CO/mm cu. ft.; 1.9 lbs PM10/mm cu. ft.; 5.5 lbs VOC/mm cu. ft.; and 0.6 lb SO2/mm cu. ft. The annual emissions were established by multiplying the maximum hourly natural gas usage by the appropriate emission factor, then multiplying the result by 8,760 hours per year, and dividing the result by 2000 lbs/ton.

d. Emission Limitation:

0.020 lb PE/mmBtu of actual heat input (for the drying oven)

Applicable Compliance Method:

Natural gas is an inherently clean fuel, and therefore compliance with this limitation is assumed when burning only natural gas. If required, the permittee

shall demonstrate compliance with the PE limitation through emission tests performed in accordance with OAC rule 3745-17-03(B)(9).

e. VOC Content Limitation:

The VOC content of the coating material employed in this emissions unit shall not exceed 3.0 pounds per gallon, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined through the record keeping requirements established in section d) of this permit.

f. Emission Limitation:

VOC emissions shall not exceed 17.24 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the record keeping requirements established in section d) of this permit.

g. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

g) Miscellaneous Requirements

(1) None.

5. K007, Gecom tumbler

Operations, Property and/or Equipment Description:

Gecom tumbler, tumble coating

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Coating usage shall not exceed 3.0 gallons per day. The VOC content of the coatings employed in this emissions unit shall not exceed 6.1 pounds per gallon, as applied.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V for HAP and the requirement of 40 CFR Part 63 Subpart MMMM, “National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products”).	See 1.b)(1) of Section B.
c.	OAC rule 3745-31-05(E) (Voluntary limit to minimize emissions from this emissions unit)	VOC emissions shall not exceed 3.32 tons per rolling, 12-month summation.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-21-09(U)(2)(e)	The coating usage limitation established pursuant to this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

(1) None.

c) Operational Restrictions

(1) The maximum annual coating usage for this emissions unit shall not exceed 1,095 gallons, based upon a rolling, 12-month summation of the coating usage figures.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records of the following information for this emissions unit:

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

b. the volume, in gallons, of each coating employed; and

c. the total volume, in gallons, of all of the coatings employed.

(2) The permittee shall maintain monthly records of the following information for this emissions unit:

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

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

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

d. the rolling, 12-month summation of the coating usage figures;

e. the total VOC emissions for all coatings employed, in tons, i.e., summation of (b x c) for each coating employed divided by 2000 lbs/ton; and

f. the rolling, 12-month summation of the total VOC emissions for this emissions unit.

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. 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 45 days after the exceedance occurs.

(2) 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 VOC content limitation in b)(1);

ii. the rolling, 12-month coating usage limitation of 1,095 gallons;

iii. the rolling, 12-month VOC emission limitation of 3.32 tons; and

iv. the probable cause of each deviation (excursion);

b. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

c. 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 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).

(3) 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.

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

(5) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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:

6.1 pounds of VOC per gallon of coating, as applied

Applicable Compliance Method:

Compliance with the coating VOC content limitation shall be determined through the record keeping requirements established in section d) of this permit.

b. Emission Limitation:

VOC emissions shall not exceed 3.51 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the record keeping requirements established in section d) of this permit.

c. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

g) Miscellaneous Requirements

(1) None.

6. K008, cylinder paint machine

Operations, Property and/or Equipment Description:

Cylinder paint machine

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. b)(1)b., below.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) content of the coatings employed in this emissions unit shall not exceed 7.91 lbs/gal, as applied. The VOC content of the cleanup materials employed in this emissions unit shall not exceed 8.58 lbs/gal, as employed. The VOC emissions shall not exceed 14.49 TPY. Particulate emissions (PE) shall not exceed 0.02 lbs/hr or 0.06 TPY from coating activities. Visible PE from the stack shall not exceed 5% opacity.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U).
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V for HAP and the requirement of 40 CFR Part 63 Subpart MMMM, "National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products").	See 1.b)(1) of Section B.
c.	OAC rules 3745-17-07(A)	The limitations specified by these rules are less stringent than the limitations established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-11(B)(2)	The hourly PE emission limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-21-09(U)(2)(e)	The daily coating usage shall not exceed 10.0 gallons.

(2) Additional Terms and Conditions

a. The 0.02 lb PE per hour limitation from coating activities reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limitation.

c) Operational Restrictions

(1) The permittee shall employ particulate filter panels as a control system for PE whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records of the following for this emissions unit:

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

b. the volume, in gallons, of each coating employed; and

c. the total volume, in gallons, of all of the coatings employed.

(2) The permittee shall maintain monthly records of the following for this emissions unit:

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

b. the name and identification of each cleanup material employed;

c. the volume, in gallons, of each cleanup material employed;

d. the VOC content, in pounds per gallon, of each cleanup material employed;

e. the VOC emissions for all the cleanup materials employed, prior to any credit for recovered materials, in tons, i.e., summation of (c x d) for each cleanup material employed divided by 2000 lbs/ton;

f. the date the recovery tank was emptied;

g. the date the materials from the recovery tank were shipped off site;

h. the number of gallons of materials from the recovery tank shipped off site;

i. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material (a composite sample of all drums is acceptable for purposes of this requirement);

j. the VOC from recovered materials, to be credited against the total VOC emissions from the cleanup materials employed, in tons, i.e., summation of (h x i) for each shipment divided by 2000 lbs/ton;

k. the net VOC emissions for all the cleanup materials employed, in tons, i.e., (e - j); and

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

(3) The permittee shall maintain records that document any time periods when the particulate filter panels serving this emissions unit are not in service while this emissions unit is operating.

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. 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 45 days after the exceedance occurs.

(2) The permittee shall notify Ohio EPA, Southwest District Office in writing of any monthly record showing the use of any coating or cleanup material that exceeds the VOC content limitations of 7.91 lbs/gal and 8.58 lbs/gal, respectively. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office within 45 days following the end of the calendar month.

(3) The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that the particulate filter panels were not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 45 days after the event occurs.

(4) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

(5) 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.

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

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. VOC Content Limitation:

7.91 lbs VOC per gallon of coating, as applied

8.58 lbs VOC per gallon of cleanup material, as employed

Applicable Compliance Method:

Compliance with the coating and cleanup material VOC content limitations shall be determined through the record keeping requirements established in Section d) of this permit.

b. Emission Limitation:

VOC emissions shall not exceed 14.49 tons per year.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined through the record keeping requirements established in d)(2) of this permit. The annual VOC emissions are the sum of the monthly VOC emissions for the calendar year.

To determine the monthly VOC emissions from this emissions unit, the following equation may be used:

E = [(C)(Cvoc) + (Cl)(Clvoc) - (R)(Rvoc)] ÷ (2000 lbs/ton)

where:

E = VOC emissions rate, in tons per month

C = monthly coating, in gallons

Cvoc = maximum coating VOC content of 7.91 lbs/gal

Cl = monthly cleanup material usage, in gallons

Clvoc = maximum cleanup material VOC content of 8.58 lbs/gal

R = the number of gallons of materials from the recovery tank shipped off site, in gallons

Rvoc = the VOC content of the material shipped off-site

c. Emission Limitation:

0.02 pound per hour and 0.06 ton per year PE for coating activities

Applicable Compliance Method:

To determine the actual worst-case emission rate for PE from coating activities, the following equation may be used:

E = Cs(1 - TE)(1 - CE)

where:

E = PE rate, in pounds per hour

Cs = maximum potential coating solids usage rate, in pounds per hour

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (25% TE,

based upon "Compilation of Air Pollutant Emission Factors," AP-42, Table 4.2.2.14-1, revised 9/90)

CE = control efficiency of the fabric filter control system. (96% CE, based on manufacturer information)

If required, the permittee shall demonstrate compliance with the hourly PE limitation through emission tests performed 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).

The annual PE limitation was established by a similar equation with a maximum annual coating usage of 3,650 gallons, based upon 10 gallons per day and 365 days per year. The resulting pounds of PE per year is then converted to tons by dividing by 2000 lbs/ton.

d. Emission Limitation:

Visible PE from the stack shall not exceed 5% opacity.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

e. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

g) Miscellaneous Requirements

(1) None.

7. P004, Hydrophilic mixing tank, 300 gallon

Operations, Property and/or Equipment Description:

Hydrophilic mixing tank, 300-gallon stainless steel tank for batch mixing

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. b)(1)b., below.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 28.5 lbs/day or 5.2 TPY. Particulate emissions (PE) shall not exceed 10.7 lbs/day or 2.0 tons PE per rolling, 12-month summation. Visible PE from the stack shall not exceed 5% opacity.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V for HAP and the requirement of 40 CFR Part 63 Subpart MMMM, “National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products”).	See 1.b)(1) of Section B.

(2) Additional Terms and Conditions

a. The daily emission limitations for VOC, 28.5 pounds, and for PE, 10.7 pounds, are established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following for this emissions unit:

a. the name and identification of each solvent material, as employed; the number of pounds of all solvent materials employed;

b. the total VOC emission rate for all solvents employed, in pounds, i.e., [(c) x (0.020], solvent loss factor*); and

*The 2%, by weight, solvent loss factor is based upon, "Compilation of Air Pollutant Emission Factors," AP-42, Section 6.4, revised 1/95.

(2) The permittee shall maintain monthly records of the following for this emissions unit:

a. the number of pounds of each solid material employed;

b. the total PE rate for all solids employed, in pounds, i.e., [(a) x (0.01, loss factor*)];

*The 1%, by weight, loss factor is based upon, "Compilation of Air Pollutant Emission Factors," AP-42, Section 6.4, revised 1/95.

e) Reporting Requirements

(1) The permittee shall submit annual reports to Ohio EPA, Southwest District Office, which specify the total VOC emissions (limitation of 5.2 tons/year) and the total particulate emissions (limitation of 2.0 tons). The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

(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) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required

documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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:

28.5 lbs VOC per day.

Applicable Compliance Method:

The daily VOC emission rate was derived by multiplying the maximum solvent usage rate per batch, 475 pounds, by the maximum batches per day, three, then multiplying the product by the solvent loss factor of 2%. The 2%, by weight, solvent loss factor is based upon, "Compilation of Air Pollutant Emission Factors," AP-42, Section 6.4, revised 1/95.

b. Emission Limitation:

5.2 tons VOC per year

2.0 tons PE per year

Applicable Compliance Method:

Compliance with the annual VOC and PE limitations shall be determined through the record keeping requirement established in Section d) of this permit.

c. Emission Limitation:

10.7 lbs PE per day

Applicable Compliance Method:

The daily PE rate was derived by multiplying the maximum solids usage rate per batch, 365 pounds, by the maximum batches per day, three, and then multiplying thee product by the particulate emission loss factor of 1%. The 1%, by weight,

loss factor is based upon, "Compilation of Air Pollutant Emission Factors," AP-42, Section 6.4, revised 1/95.

d. Emission Limitation:

Visible PE from the stack shall not exceed 5% opacity.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

e. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

g) Miscellaneous Requirements

(1) None.