



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

9/19/2016

Certified Mail

Mr. Gary Vanover  
 Stillwater Coating Company  
 720 Riffle Avenue  
 Greenville, OH 45331

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

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

Facility ID: 0819075011  
 Permit Number: P0121027  
 Permit Type: Initial Installation  
 County: Darke

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Greenville Daily Advocate. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Regional Air Pollution Control Agency  
 117 South Main Street  
 Dayton, OH 45422-1280

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification  
 RAPCA; Indiana



## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

K001 and K002 are spray coating booths used to coat miscellaneous metal parts. They coat parts used in the manufacture of components for the automobile industry and are the only two emissions units located at the facility. These two emissions units were formerly permitted under Facility ID 0819070244, federally enforceable permit to install and operate (FEPTIO) P0104655 at the 868 Sater St. address. In July 2015 the Stillwater Coating Company moved to the current 720 Riffle Ave address and this FEPTIO is for the initial installation of K001 and K002 at the new location.

3. Facility Emissions and Attainment Status:

Stillwater Coating Company is located in Greenville, Ohio which is in Darke County. Darke County is in attainment for all criteria pollutants. Materials used in the facility's coating process contain compounds which are listed as hazardous air pollutants (HAPs) under Section 112(b) of the Clean Air Act. Other air contaminants emitted from emissions units K001 and K002 are volatile organic compounds (VOC). Stillwater Coating Company has a potential to emit (PTE) that is above Title V permitting thresholds for an individual hazardous air pollutant (HAP). This FEPTIO is an initial installation and includes federally enforceable requirements making the facility synthetic minor (SM) for HAPs to avoid Title V permitting and the miscellaneous metal parts coating MACT, 40 CFR Part 63 Subpart Mmmm.

4. Source Emissions:

Using the SIP limitation of 10 gallon/day in OAC rule 3745-21-09(U)(2)(e)(iii) the PTE for each source would be 67.50 lbs. VOC/day and 12.31 tons per year (TPY) VOC, resulting in an annual PTE of 24.62 TPY for both sources combined. With the SIP limitation the unrestricted PTE for VOC and total HAPs would be below Title V and MACT thresholds. However, the facility single HAP (i.e., toluene) emissions would be greater than the 10 TPY Title V and MACT major source thresholds. The facility requested a federally enforceable restriction on the annual coating and cleanup materials used for K001 and K002 to limit the facility HAP emissions to less than 9.9 tons per year for a single HAP and 24.9 tons per year for combined HAPs. Based on the restriction contained in this FEPTIO (3000 gallon/year restriction on the coating and cleanup usage for K001 and K002 combined) the maximum combined emissions for both sources will be, 10.1 tons VOC per rolling 12-month period, 8.9 tons single HAP (toluene) per rolling, 12-month period, and 10.1 tons combined HAPs per rolling, 12-month period.

5. Conclusion:

With the federally enforceable coating and cleanup usage restriction and limitations contained in this FEPTIO, the facility will be SM for HAP emissions and below MACT and Title V permitting thresholds.

6. Please provide additional notes or comments as necessary:

None



**Permit Strategy Write-Up**  
Stillwater Coating Company  
**Permit Number:** P0121027  
**Facility ID:** 0819075011

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

<u>Pollutant</u>	<u>Tons Per Year</u>
Organic compounds	<u>10.1</u>
Single HAP	<u>9.9</u>
Combined HAPs	<u>24.9</u>

## PUBLIC NOTICE

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

### Draft Air Pollution Permit-to-Install and Operate Initial Installation

Stillwater Coating Company

720 Riffle Ave., Greenville, OH 45331

ID#:P0121027

Date of Action: 9/19/2016

Permit Desc:Initial installation of two spray coating booths used to coat miscellaneous metal parts. This permit includes coating usage restrictions to limit the facility-wide potential to emit of HAP emissions below the Title V threshold..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Cathy Oneill, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280. Ph: (937)225-4435





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Stillwater Coating Company**

Facility ID:	0819075011
Permit Number:	P0121027
Permit Type:	Initial Installation
Issued:	9/19/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Stillwater Coating Company

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**Draft Permit-to-Install and Operate**

Stillwater Coating Company

**Permit Number:** P0121027

**Facility ID:** 0819075011

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0819075011  
Application Number(s): A0056272  
Permit Number: P0121027  
Permit Description: Initial installation of two spray coating booths used to coat miscellaneous metal parts. This permit includes coating usage restrictions to limit the facility-wide potential to emit of HAP emissions below the Title V threshold.  
Permit Type: Initial Installation  
Permit Fee: \$800.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 9/19/2016  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Stillwater Coating Company  
720 Riffle Ave  
Greenville, OH 45331

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:

Regional Air Pollution Control Agency  
117 South Main Street  
Dayton, OH 45422-1280  
(937)225-4435

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Director



**Draft Permit-to-Install and Operate**

Stillwater Coating Company

**Permit Number:** P0121027

**Facility ID:** 0819075011

**Effective Date:** To be entered upon final issuance

## Authorization (continued)

Permit Number: P0121027

Permit Description: Initial installation of two spray coating booths used to coat miscellaneous metal parts. This permit includes coating usage restrictions to limit the facility-wide potential to emit of HAP emissions below the Title V threshold.

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

### Group Name: Spray Coating Booths Group

<b>Emissions Unit ID:</b>	<b>K001</b>
Company Equipment ID:	K001 Spray Coating Booth No.1
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K002</b>
Company Equipment ID:	K002 Spray Coating Booth No.2
Superseded Permit Number:	
General Permit Category andType:	Not Applicable



**Draft Permit-to-Install and Operate**  
Stillwater Coating Company  
**Permit Number:** P0121027  
**Facility ID:** 0819075011  
**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**

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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

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

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

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

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

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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



**Draft Permit-to-Install and Operate**  
Stillwater Coating Company  
**Permit Number:** P0121027  
**Facility ID:** 0819075011  
**Effective Date:** To be entered upon final issuance

## **B. Facility-Wide Terms and Conditions**



**Draft Permit-to-Install and Operate**

Stillwater Coating Company

**Permit Number:** P0121027

**Facility ID:** 0819075011

**Effective Date:** To be entered upon final issuance

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.
    - (2) None.
2. The permittee is advised that this facility may be subject to the "Generally Available Control Technology" (GACT) requirements under Title 40 of the Code of Regulations, Part 63, Subpart HHHHHH, the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. At this time the Ohio EPA is not accepting the delegating authority to enforce the standards promulgated under the Urban Air Toxics Strategy. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of this Subpart (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the appropriate Ohio EPA District Office or Local Air Agency.



**Draft Permit-to-Install and Operate**  
Stillwater Coating Company  
**Permit Number:** P0121027  
**Facility ID:** 0819075011  
**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**

**1. Emissions Unit Group -Spray Coating Booths Group: K001,K002,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K001	Spray Coating Booth No.1
K002	Spray Coating Booth No.2

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)e., d)(10) through d)(13) and e)(3).

(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)d.

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.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	ORC 3704.03(T) and OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from coatings and cleanup materials shall not exceed 0.84 tons per month averaged over a 12-month rolling period for unit K001 and K002, individually.
b.	OAC rule 3745-21-09(U)(2)(e)(iii)	The volume of coating applied in this emissions unit shall not exceed 10 gallons per day.
c.	OAC rule 3745-17-11(C)	See c)(1) and c)(2).
d.	OAC rule 3754-31-05(D) (synthetic minor to avoid MACT and Title V)	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 and K002, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of



**Draft Permit-to-Install and Operate**

Stillwater Coating Company

**Permit Number:** P0121027

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		HAPs, per rolling 12-month summation.  See b)(2)a. and b)(2)b.
e.	OAC rule 3745-114-01 and ORC 3704.03(F)(4)(c)	See d)(10) through d)(12).

(2) Additional Terms and Conditions

- a. The permittee has requested federally enforceable restrictions to limit the annual emissions and establish the PTE for this pollutant based on the limitation on the coating and cleanup materials usage.
- b. The maximum annual coating and cleanup usage for emissions units K001 and K002 combined shall not exceed 3000 gallons/year, based upon a rolling, 12-month summation of the coating and cleanup usage figures. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating and cleanup usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage (gallons)
1	250
1-2	500
1-3	750
1-4	1000
1-5	1250
1-6	1500
1-7	1750
1-8	2000
1-9	2250
1-10	2500
1-11	2700
1-12	3000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating and cleanup usage limitation shall be based upon a rolling, 12-month summation of the coating and cleanup usage figures.

c) Operational Restrictions

- (1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for the coating line.
  - 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 collect and record the following information on a monthly basis for the coating and cleanup materials applied in this emissions unit:
  - a. the number of gallons of each coating applied or all coatings applied during the month;
  - b. the maximum VOC content for each or the maximum VOC content of all the coatings applied, in pounds per gallon;
  - c. the total VOC emissions from all coatings applied, i.e., the summation of the products of "a" times "b" for each individual coating applied; or the product of the maximum VOC content of all the coatings applied times the total gallons of coating employed during the month, i.e., "a" times "b" for worst case coating;
  - d. the name and identification of each cleanup material employed;
  - e. the VOC content of each cleanup material, in pounds per gallon;
  - f. the number of gallons of each cleanup material employed;
  - g. the total VOC emission rate from all cleanup materials, i.e., the summation of the products of "e" times "f" for all cleanup materials employed;

- h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, the sum of “c” and “g”; and
  - i. the average monthly VOC emissions from all coatings and cleanup materials employed over a 12-month period, i.e. the total VOC emissions for the present month plus the previous 11 months, in tons, divided by 12 months.
- (3) The permittee shall maintain monthly records of the following information:
- a. the total monthly coating and cleanup usage for emissions units K001 and K002 combined for each month; and
  - b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the coating and cleanup usage figures for emissions units K001 and K002 combined.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month.

- (4) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)<sup>1</sup> that are applied in the emissions units:
- a. The name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP.
  - b. The name/identification and the weight fraction of each individual HAP contained in each material applied and identified in d)(4)a. above) [i.e., pound of each individual HAP per pound of each HAP-containing material].
  - c. The number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month.
  - d. The density of each coating, thinner, additive, cleanup material, and other material employed, in pound(s) per gallon.
  - e. For each individual HAP, the total emissions from all the materials employed, in tons [i.e., for each individual HAP, the summation of the products of d)(4)b. times d)(4)c. times d)(4)d. for all the materials applied during the month, divided by 2,000 pounds].
  - f. The total combined HAPs emissions from all the materials employed during the month, in tons [i.e., the summation of all the individual HAPs emissions from d)(4)e. above].
  - g. For each individual HAP, the total emissions during the rolling, 12-month period [i.e., the summation of the individual HAP emissions, as recorded in d)(4)e. above], for the present month plus the previous 11 months of operation, in tons.

- h. The total combined HAP emissions during the rolling 12-month period [i.e., the summation of all HAP emissions, as recorded in d)(4)f. above], for the present month plus the previous 11 months of operation, in tons.

<sup>1</sup> A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

- (5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (6) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA District Office or local air agency upon request.
- (7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (9) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA District Office or local air agency upon request.

(10) The federally enforceable permit-to-install and operate (FEPTIO) application for this/these emissions unit(s), K001 and K002, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
  - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
  - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., [X] hours per day and [Y] days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants or "worst case" toxic contaminant(s):

Toxic Contaminant: toluene

TLV (mg/m3): 75.0

Maximum Hourly Emission Rate (lbs/hr): 23.84



Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5749.02

MAGLC (ug/m3): 7500\*

Toxic Contaminant: xylene

TLV (mg/m3): 434.2

Maximum Hourly Emission Rate (lbs/hr): 10.24

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2469.38

MAGLC (ug/m3): 43,420\*

Toxic Contaminant: ethylbenzene

TLV (mg/m3): 434.2

Maximum Hourly Emission Rate (lbs/hr): 2.40

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 578.76

MAGLC (ug/m3): 43,420\*

Toxic Contaminant: methyl isobutyl ketone (MIBK)

TLV (mg/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 9.24

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,228

MAGLC (ug/m3): 20,500\*

\*Based on 8 hours per day and 5 days per week

- (11) The permittee, having demonstrated that emissions of toluene, xylene, ethylbenzene, and MIBK from emissions unit(s) K001 and K002, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).
- (12) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute", ORC 3704.03(F), will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (13) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":
  - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

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:

all exceedances of the rolling, 12-month limitation on coating and cleanup usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating and cleanup usage levels; and

all exceedances of the rolling, 12-month emission limitation for individual HAP or combined HAPs,

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 include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

(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) 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. Emissions Limitation:

VOC emissions from coatings and cleanup materials shall not exceed 0.84 tons per month averaged over a 12-month rolling period for unit K001 and K002 individually.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

b. Emissions Limitation:

The volume of coating applied in this emissions unit shall not exceed 10 gallons per day.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1).

c. Emissions Limitation:

The emissions of HAPs, as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001 and K002, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.



Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(4) of this permit.

- (2) In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

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

g) Miscellaneous Requirements

- (1) None.