



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

9/23/2016

Certified Mail

Miss. Wendy Myers
 Precision Coating Systems, Inc.
 948 Columbus Ave
 Marysville, OH 43040

| | |
|-----|------------------------------------|
| 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: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0180010167
 Permit Number: P0120603
 Permit Type: Renewal
 County: Union

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, Central District Office at (614)728-3778 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-CDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Precision Coating Systems, Inc.**

| | |
|----------------|------------|
| Facility ID: | 0180010167 |
| Permit Number: | P0120603 |
| Permit Type: | Renewal |
| Issued: | 9/23/2016 |
| Effective: | 9/23/2016 |
| Expiration: | 1/21/2019 |



Division of Air Pollution Control
Permit-to-Install and Operate
for
Precision Coating Systems, Inc.

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Final Permit-to-Install and Operate
Precision Coating Systems, Inc.
Permit Number: P0120603
Facility ID: 0180010167
Effective Date: 9/23/2016

Authorization

Facility ID: 0180010167
Application Number(s): A0055600, A0056316, A0056401
Permit Number: P0120603
Permit Description: FEPTIO renewal permit for spray booth and paint mixing/preparing room of P0107678 for K001-K004 and P001, and of P0103659 for K006. P0103659 was erroneously issued 7 years ago as a 10-year permit instead of a 5-year permit, so it is included with this renewal.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 9/23/2016
Effective Date: 9/23/2016
Expiration Date: 1/21/2019
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Precision Coating Systems, Inc.
948 Columbus Ave
Marysville, OH 43040

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0120603

Permit Description: FEPTIO renewal permit for spray booth and paint mixing/preparing room of P0107678 for K001-K004 and P001, and of P0103659 for K006. P0103659 was erroneously issued 7 years ago as a 10-year permit instead of a 5-year permit, so it is included with this renewal.

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

Emissions Unit ID: K006
 Company Equipment ID: Booth #6
 Superseded Permit Number: P0103659
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P001
 Company Equipment ID: Mixing Room
 Superseded Permit Number: P0107678
 General Permit Category and Type: Not Applicable

Group Name: Spray Booths

| | |
|-----------------------------------|--------------------|
| Emissions Unit ID: | K001 |
| Company Equipment ID: | Downdraft Booth #1 |
| Superseded Permit Number: | P0107678 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | K002 |
| Company Equipment ID: | Downdraft Booth #2 |
| Superseded Permit Number: | P0107678 |
| General Permit Category and Type: | Not Applicable |

Group Name: Spray Booths with Internal Ovens

| | |
|-----------------------------------|----------------|
| Emissions Unit ID: | K003 |
| Company Equipment ID: | Booth #3 |
| Superseded Permit Number: | P0107678 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | K004 |
| Company Equipment ID: | Booth #4 |
| Superseded Permit Number: | P0107678 |
| General Permit Category and Type: | Not Applicable |



Final Permit-to-Install and Operate
Precision Coating Systems, Inc.
Permit Number: P0120603
Facility ID: 0180010167
Effective Date: 9/23/2016

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.



Final Permit-to-Install and Operate
Precision Coating Systems, Inc.
Permit Number: P0120603
Facility ID: 0180010167
Effective Date: 9/23/2016

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 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.



Final Permit-to-Install and Operate
Precision Coating Systems, Inc.
Permit Number: P0120603
Facility ID: 0180010167
Effective Date: 9/23/2016

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) B.2. through B.7.
2. In accordance with OAC rule 3745-31-05(D) to avoid Title V, the combined facility-wide (from premise numbers 0180010167 and 0180010401) emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all emissions units, including all de minimis emissions units as defined in OAC rule 3745-15-05, and all registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon rolling, 12-month summations of the HAP emissions.
3. Operational Restrictions
 - a) The total coating usage in emissions units K001, K002, K003, K004, K006 and P001 at facility 0180010167 shall not exceed 10,000 gallons per rolling, 12-month period.
 - b) The total coating usage in emissions units K101 and P101 at facility 0180010401 shall not exceed 5,000 gallons per rolling, 12-month period.
4. The permittee shall maintain monthly records of the following information:
 - a) the total gallons of coating employed in emissions units K001, K002, K003, K004, K006 and P001 at facility 0180010167;
 - b) the total gallons of coating employed in emissions units K101 and P101 at facility 0180010401;
 - c) the combined facility-wide (from premise numbers 0180010167 and 0180010401) individual HAP emissions, in tons per month;
 - d) the combined facility-wide (from premise numbers 0180010167 and 0180010401) combined HAPs emissions, in tons per month;
 - e) the rolling, 12-month summation of coating usage in emissions units K001, K002, K003, K004, K006 and P001 at facility 0180010167, in gallons;
 - f) the rolling, 12-month summation of coating usage in emissions units K101 and P101 at facility 0180010401, in gallons;

- g) the rolling, 12-month summation of combined facility-wide (from premise numbers 0180010167 and 0180010401) individual HAP emissions, in tons; and
 - h) the rolling, 12-month summation of combined facility-wide (from premise numbers 0180010167 and 0180010401) combined HAPs emissions, in tons.
5. The permittee shall submit quarterly deviation (excursion) reports that identify:
- a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping and/or testing requirements in this permit:
 - (1) all exceedances of the rolling, 12-month limitation of coating usage in emissions units K001, K002, K003, K004, K006 and P001 at facility 0180010167;
 - (2) all exceedances of the rolling, 12-month limitation of coating usage in emissions units K101 and P101 at facility 0180010401;
 - (3) all exceedances of the rolling, 12-month individual HAP emission limitation; and
 - (4) all exceedances of the rolling, 12-month combined HAPs emission limitation.
 - 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 Ohio EPA, Central District Office).

- 6. Compliance with the rolling, 12-month HAP emissions limitations specified in section B.2 of these terms and conditions shall be determined in accordance with the recordkeeping requirements of section B.4.
- 7. 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 Area Sources: Paint Stripping and Miscellaneous Surface Coating Operations. 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 Ohio EPA, Central District Office.



Final Permit-to-Install and Operate
Precision Coating Systems, Inc.
Permit Number: P0120603
Facility ID: 0180010167
Effective Date: 9/23/2016

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Spray Booths: K001 and K002

| EU ID | Operations, Property and/or Equipment Description |
|--------------|---|
| K001 | One of two first stage spray booths (booth #1), coating of misc metal or fiberglass, with arrestor filters |
| K002 | Second of two first stage spray booths (booth #2), coating of misc metal or fiberglass, with arrestor filters |

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)f., d)(10) through d)(13), and e)(5)

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

a. b)(1)e., c)(4) through c)(8), d)(8), d)(9), e)(3), and f)(1)e.

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 3745-17-07(A)(1) | Visible particulate emissions from any stack serving this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as specified by rule. |
| b. | OAC rule 3745-17-11(C) | See c)(1), (c)(2), and d)(1) through d)(5) below. |
| c. | OAC rule 3745-21-09(U)(2)(e)(iii) | See b)(2)a. below. |
| d. | OAC rule 3745-31-05(A)(3) [Best available technology for VOC and PE] | <p>Volatile organic compound (VOC) emissions shall not exceed 26.74 pounds per hour and 17.62 tons per year from all coatings and clean-up materials employed in K001 and K002, each.</p> <p>Particulate emissions (PE) shall not exceed 0.156 tons per year.</p> |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|--|---|
| | | See b)(2)b. and c)(3) below. |
| e. | OAC rule 3745-31-05(D) [Federally enforceable restriction to avoid Title V] | VOC emissions from K001-K004, K006, and P001, combined, shall not exceed 34.1 tons per year from coating and clean-up material usage based on a rolling, 12-month summation of the emissions. See B.2. through B.7. of the Facility-Wide Terms and Conditions above and c)(4) through c)(8) below. |
| f. | ORC 3704.03(F)(3)(c) and (F)(4) [Toxic Air Contaminant Statute] | See d)(10) through d)(13) and e)(5) below. |

(2) Additional Terms and Conditions

- a. The permittee shall not employ more than ten gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.
- b. The hourly and annual VOC and PE limits were established to reflect the potentials-to-emit for K001 and K002, taking into account the facility-wide restriction of 10,000 gallons coating and 350 gallons clean-up materials used per rolling, 12-month period. It is not necessary to develop monitoring, recordkeeping, or reporting requirements to ensure compliance with these limitations.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- (3) For each emissions unit, coating usage shall not exceed 417 gallons per month.
- (4) The usage of coating materials for emissions units K001-K004, K006, and P001, combined, shall not exceed 10,000 gallons per rolling, 12-month period.

- (5) The usage of clean-up materials for emissions units K001-K004, K006, and P001, combined, shall not exceed 350 gallons per rolling, 12-month period.
- (6) The VOC content of coatings employed in emissions units K001-K004, K006, and P001 shall not exceed 6.57 pounds VOC per gallon, as applied.
- (7) The VOC content of clean-up materials employed in emissions units K001-K004, K006, and P001 shall not exceed 6.8 pounds VOC per gallon, as applied.
- (8) The individual HAP content of coatings employed in emissions units K001-K004, K006, and P001 shall not exceed 1.22 pounds HAP per gallon, as applied.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) 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 Ohio EPA, Central District Office upon request.
- (2) 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, the permittee shall maintain a copy of the manufacturer's recommended inspection frequency, and it shall be made available to the Ohio EPA upon request.
- (3) 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.
- (4) 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 the 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 Ohio EPA, Central District Office upon request.

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

according to the manufacturer's recommendations, with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

- (6) The permittee shall collect and record the following information each day for each coating line when coating miscellaneous metal parts and products:
 - a. the name and identification number of each coating employed in the coating line;
 - b. the volume, in gallons, of each coating employed in the coating line; and
 - c. the total volume, in gallons, of all of the coatings employed in the coating line.
- (7) The permittee shall maintain monthly records of the total gallons of coatings employed in emissions units K001 and K002, individually.
- (8) The permittee shall maintain monthly records of the following information for emissions units K001-K004, K006, and P001 for the purpose of demonstrating compliance with the federally enforceable restriction on VOC emissions:
 - a. the identification of each coating and clean-up material employed;
 - b. the total number of gallons of each coating and clean-up material employed;
 - c. the VOC content of each coating and clean-up material employed, in pounds per gallon;
 - d. the total gallons of coatings employed in emissions units K001-K004, K006, and P001, combined;
 - e. the total gallons of clean-up material employed in emissions units K001-K004, K006, and P001, combined;
 - f. the total VOC emissions from all coatings and clean-up materials employed in emissions units K001-K004, K006, and P001, combined, in tons per month;
 - g. the rolling, 12-month summation of coating usage in emissions units K001-K004, K006, and P001, combined, in gallons; and
 - h. the rolling, 12-month summation of VOC emissions from all coating and clean-up materials employed in emissions units K001-K004, K006, and P001, combined, in tons.
- (9) The permittee shall collect and record the following information each month for all materials containing any HAP¹ that is applied in the emissions unit:
 - a. the name and identification number/code of each coating, thinner, additive, clean-up material, and any other material containing any HAP;

- b. the name/identification of each individual HAP contained in each material applied (and identified in "a" above) and the pounds of each HAP per gallon of each HAP-containing material applied;
- c. the number of gallons of each coating, thinner, additive, clean-up material, and other material applied during the month;
- d. 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 "b" times "c" for all the materials applied during the month, divided by 2,000 pounds;
- e. 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" above;
- f. 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" above, for the present month plus the previous 11 months of operation, in tons; and
- g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in "e" above, for the present month plus the previous 11 months of operation, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting Ohio EPA, Central District Office. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

- (10) The permit application for this/these emissions unit(s), K001-K004, K006, and P001, combined, was evaluated based on the actual materials and the design parameters of the emissions unit's(s) exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or another 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 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/was 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., 24 hours per day and 7 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 MAGLC:

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

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tpy) or “worst case” toxic contaminant:

Toxic Contaminant: xylene (worst case; also toluene and MIBK)

TLV (mg/m³): 435

Maximum Hourly Emission Rate (lb/hr): 14.64

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 1,196

MAGLC (µg/m³): 10,357

The permittee, has demonstrated that emissions of xylene, from emissions unit(s) K001-K004, K006, and P001, combined, is calculated to be less than eighty percent of the 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).

(11) 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 TLV than the lowest TLV previously modeled;

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

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final permit 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.

- (12) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the 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.
- (13) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) 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 Air Services. In the event of an alternative hard copy submission in lieu of Air Services, 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 Central District Office, 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.
- (2) 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 PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month limitation of coating usage in emissions units K001-K004, K006, and P001, combined;
 - ii. all exceedances of the VOC content limitations on the coatings and clean-up materials employed in emissions units K001-K004, K006, and P001;
 - iii. all exceedances of the individual HAP content limitation on the coatings employed in emissions units K001-K004, K006, and P001;
 - iv. all exceedances of the rolling, 12-month VOC emissions limitation;
 - 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 Central District Office).

- (4) The permittee shall notify the Director (the Ohio EPA, Central District Office) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit established under OAC rule 3745-21-09(U)(2)(e)(iii). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Central District Office) within 45 days after the exceedance occurs.
 - (5) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual PER. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).
 - b. Emissions Limitation:

VOC emissions shall not exceed 26.74 pounds per hour from all coatings and clean-up materials employed in K001 and K002, each.

Applicable Compliance Method:

The hourly emissions limitation was established to reflect the potential to emit based on the information provided in the permit application as follows:

Hourly VOC emissions = [(coating material usage) x (VOC content of coating)] + [(clean-up material usage) x (VOC content of clean-up material)], where:

Coating material usage = maximum hourly usage (2 gal/hr)
VOC content of coating = maximum VOC content (6.57 lb VOC/gal)

Clean-up material usage = maximum hourly usage (2 gal/hr)
VOC content of clean-up material = maximum VOC content (6.8 lb VOC/gal)

c. Emissions Limitation:

VOC emissions shall not exceed 17.62 tons per year from all coatings and clean-up materials employed in K001 and K002, each.

Applicable Compliance Method:

The annual emissions limitation was established to reflect the potential to emit, taking into account the monthly gallon usage restriction as follows:

Annual VOC emissions = $[(\text{coating material usage}) \times (\text{VOC content of coating})] + [(\text{clean-up material usage}) \times (\text{VOC content of clean-up material})] / (2,000 \text{ lb/ton})$, where:

Coating material usage = maximum annual usage (5,000 gal)
VOC content of coating = maximum VOC content (6.57 lb VOC/gal)
Clean-up material usage = maximum annual usage (350 gal)
VOC content of clean-up material = maximum VOC content (6.8 lb VOC/gal)

d. Emissions Limitation:

PE shall not exceed 0.156 tons per year.

Applicable Compliance Method:

The annual emissions limitation was established to reflect the actual worst-case annual particulate emissions rate (E) using the following equation for the paint spraying operations:

$E = \text{coating material usage} \times \text{solids content} \times (1-TE) \times (1-CE) / (2,000 \text{ lb/ton})$, where:

Coating material usage = maximum coating usage (5,000 gal/yr)
Solids content = maximum solids content (8.31 lb solids/gal)
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 (62.5%)
CE = control efficiency of the control equipment (assumed to be 98%)

If required, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

e. Emissions Limitation:

VOC emissions from K001-K004, K006, and P001, combined, shall not exceed 34.1 tons per year from coating and clean-up material usage based on a rolling, 12-month summation of the emissions.

Applicable Compliance Method:



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Permit Number: P0120603
Facility ID: 0180010167
Effective Date: 9/23/2016

Compliance with this emissions limitation shall be demonstrated through the recordkeeping requirements established in d)(8) above.

- g) Miscellaneous Requirements
 - (1) None.

2. Emissions Unit Group - Spray Booths with Internal Ovens: K003 and K004

| EU ID | Operations, Property and/or Equipment Description |
|--------------|--|
| K003 | Spray booth (booth #3) for the application of a top coat and a clear coat to misc metal or fiberglass with arrestor filters and serviced by a central oven and an internal oven as a back up |
| K004 | Spray booth (booth #4), coating of misc metal or fiberglass, with arrestor filters and serviced by an internal 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)(10) through d)(13), and e)(5).

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

a. b)(1)f., c)(4) through c)(8), d)(8), d)(9), e)(3), and f)(1)g.

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 3745-17-07(A)(1) | Visible particulate emissions from any stack serving this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as specified by rule. |
| b. | OAC rule 3745-17-10(B)(1) | Particulate emissions (PE) shall not exceed 0.020 lb/MMBtu of actual heat input from any indirect-fired oven associated with this emissions unit. |
| c. | OAC rule 3745-17-11(C) | See c)(1), c)(2), and d)(1) through d)(5) below. |
| d. | OAC rule 3745-21-09(U)(2)(e)(iii) | See b)(2)a. below. |
| e. | OAC rule 3745-31-05(A)(3) [Best available technology for VOC and PE] | Volatile organic compound (VOC) emissions shall not exceed 26.74 pounds per hour and 17.62 tons per year from all |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|---|---|
| | | <p>coatings and clean-up materials employed in K003 and K004, each.</p> <p>PE from all coatings and clean-up materials employed in emissions units K001 and K002, each, shall not exceed 0.156 tons per year.</p> <p>Emissions from the internal ovens shall not exceed the following limits.</p> <p>For K003:</p> <p>0.023 lb PE/hr and 0.099 ton PE/yr 0.30 lb NO_x/hr and 1.314 tons NO_x/yr 0.252 lb CO/hr and 1.104 tons CO/yr 0.002 lb SO₂/hr and 0.008 ton SO₂/yr</p> <p>For K004:</p> <p>0.015 lb PE/hr and 0.066 ton PE/yr 0.20 lb NO_x/hr and 0.876 ton NO_x/yr 0.168 lb CO/hr and 0.736 ton CO/yr 0.001 lb SO₂/hr and 0.005 ton SO₂/yr</p> <p>See b)(2)b. and c)(3) below.</p> |
| f. | <p>OAC rule 3745-31-05(D) [Federally enforceable restriction to avoid Title V]</p> | <p>VOC emissions from K001-K004, K006, and P001, combined, shall not exceed 34.1 tons per year from coating and clean-up material usage based on a rolling, 12-month summation of the emissions.</p> <p>See B.2. through B.7. of the Facility-Wide Terms and Conditions above and c)(4) through c)(8) below.</p> |
| g. | <p>ORC 3704.03(F)(3)(c) and (F)(4) [Toxic Air Contaminant Statute]</p> | <p>See d)(10) through d)(13) and e)(5) below.</p> |

(2) Additional Terms and Conditions

- a. The permittee shall not employ more than ten gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.

- b. The hourly and annual VOC and PE limits were established to reflect the potentials-to-emit for K003 and K004, taking into account the facility-wide restriction of 10,000 gallons coating and 350 gallons clean-up materials used per rolling, 12-month period. It is not necessary to develop monitoring, recordkeeping, or reporting requirements to ensure compliance with these limitations.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- (3) For each emissions unit, coating usage shall not exceed 417 gallons per month.
- (4) The usage of coating materials for emissions units K001-K004, K006, and P001, combined, shall not exceed 10,000 gallons per rolling, 12-month period.
- (5) The usage of clean-up materials for emissions units K001-K004, K006, and P001, combined, shall not exceed 350 gallons per rolling, 12-month period.
- (6) The VOC content of coatings employed in emissions units K001-K004, K006, and P001 shall not exceed 6.57 pounds VOC per gallon, as applied.
- (7) The VOC content of clean-up materials employed in emissions units K001-K004, K006, and P001 shall not exceed 6.8 pounds VOC per gallon, as applied.
- (8) The individual HAP content of coatings employed in emissions units K001-K004, K006, and P001 shall not exceed 1.22 pounds HAP per gallon, as applied.

d) Monitoring and/or Recordkeeping Requirements

- (1) 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 Ohio EPA, Central District Office upon request.
- (2) 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, the permittee shall maintain a copy of the manufacturer's recommended inspection frequency, and it shall be made available to the Ohio EPA upon request.

- (3) 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.
- (4) 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 the 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 Ohio EPA, Central District Office upon request.

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations, with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (6) The permittee shall collect and record the following information each day for each coating line when coating miscellaneous metal parts and products:
 - a. the name and identification number of each coating employed in the coating line;
 - b. the volume, in gallons, of each coating employed in the coating line; and
 - c. the total volume, in gallons, of all of the coatings employed in the coating line.
- (7) The permittee shall maintain monthly records of the total gallons of coatings employed in emissions units K003 and K004, individually.
- (8) The permittee shall maintain monthly records of the following information for emissions units K001-K004, K006, and P001 for the purpose of demonstrating compliance with the federally enforceable restriction on VOC emissions:
 - a. the identification of each coating and clean-up material employed;
 - b. the total number of gallons of each coating and clean-up material employed;
 - c. the VOC content of each coating and clean-up material employed, in pounds per gallon;

- d. the total gallons of coatings employed in emissions units K001-K004, K006, and P001, combined;
 - e. the total gallons of clean-up materials employed in emissions units K001-K004, K006, and P001, combined;
 - f. the total VOC emissions from all coatings and clean-up materials employed in emissions units K001-K004, K006, and P001, combined, in tons per month;
 - g. the rolling, 12-month summation of coating usage in emissions units K001-K004, K006, and P001, combined, in gallons; and
 - h. the rolling, 12-month summation of VOC emissions from all coating and clean-up materials employed in emissions units K001-K004, K006, and P001, combined, in tons.
- (9) The permittee shall collect and record the following information each month for all materials containing any HAP¹ that is applied in the emissions unit:
- a. the name and identification number/code of each coating, thinner, additive, clean-up material, and any other material containing any HAP;
 - b. the name/identification of each individual HAP contained in each material applied (and identified in "a" above) and the pounds of each HAP per gallon of each HAP-containing material applied;
 - c. the number of gallons of each coating, thinner, additive, clean-up material, and other material applied during the month;
 - d. 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 "b" times "c" for all the materials applied during the month, divided by 2,000 pounds;
 - e. 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" above;
 - f. 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" above, for the present month plus the previous 11 months of operation, in tons; and
 - g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in "e" above, for the present month plus the previous 11 months of operation, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting Ohio EPA, Central District Office. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

(10) The permit application for this/these emissions unit(s), K001-K004, K006, and P001, combined, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or another 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 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., 24 hours per day and 7 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 MAGLC:

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

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tpy) or "worst case" toxic contaminant:

Toxic Contaminant: xylene (worst case; also toluene and MIBK)

TLV (mg/m³): 435

Maximum Hourly Emission Rate (lb/hr): 14.64

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 1,196

MAGLC ($\mu\text{g}/\text{m}^3$): 10,357

The permittee, has demonstrated that emissions of xylene, from emissions unit(s) K001-K004, K006, and P001, combined, is calculated to be less than eighty percent of the 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).

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

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final permit 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.

- (12) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

- b. the 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.
- (13) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) 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 Air Services. In the event of an alternative hard copy submission in lieu of Air Services, 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 Central District Office, 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.
 - (2) 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 PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
 - (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping and/or testing requirements in this permit:

- i. all exceedances of the rolling, 12-month limitation of coating usage in emissions units K001-K004, K006, and P001, combined;
 - ii. all exceedances of the VOC content limitations on the coatings and clean-up materials employed in emissions units K001-K004, K006, and P001;
 - iii. all exceedances of the individual HAP content limitation on the coatings employed in emissions units K001-K004, K006, and P001;
 - iv. all exceedances of the rolling, 12-month VOC emissions limitation;
- 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 Central District Office).

- (4) The permittee shall notify the Director (the Ohio EPA, Central District Office) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit established under OAC rule 3745-21-09(U)(2)(e)(iii). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Central District Office) within 45 days after the exceedance occurs.
 - (5) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual PER. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:
Visible particulate emissions from any stack serving this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as specified by rule.



Final Permit-to-Install and Operate
Precision Coating Systems, Inc.
Permit Number: P0120603
Facility ID: 0180010167
Effective Date: 9/23/2016

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emissions Limitation:

PE shall not exceed 0.020 lb/MMBtu of actual heat input from any indirect-fired oven associated with this emissions unit.

Applicable Compliance Method:

If required, compliance with the PE emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emissions Limitation:

VOC emissions shall not exceed 26.74 pounds per hour from all coatings and clean-up materials employed in K003 and K004, each.

Applicable Compliance Method:

The hourly emissions limitation was established to reflect the potential to emit based on the information provided in the permit application as follows:

Hourly VOC emissions = [(coating material usage) x (VOC content of coating)] + [(clean-up material usage) x (VOC content of clean-up material)], where:

Coating material usage = maximum hourly usage (2 gal/hr)

VOC content of coating = maximum VOC content (6.57 lb VOC/gal)

Clean-up material usage = maximum hourly usage (2 gal/hr)

VOC content of clean-up material = maximum VOC content (6.8 lb VOC/gal)

d. Emissions Limitation:

VOC emissions shall not exceed 17.62 tons per year from all coatings and clean-up materials employed in K003 and K004, each.

Applicable Compliance Method:

The annual emissions limitation was established to reflect the potential to emit, taking into account the monthly gallon usage restriction as follows:

Annual VOC emissions = [[(coating material usage) x (VOC content of coating)] + [(clean-up material usage) x (VOC content of clean-up material)]] / (2,000 lb/ton), where:

Coating material usage = maximum annual usage (5,000 gal)

VOC content of coating = maximum VOC content (6.57 lb VOC/gal)

Clean-up material usage = maximum annual usage (350 gal)

VOC content of clean-up material = maximum VOC content (6.8 lb VOC/gal)

e. Emissions Limitation:

PE from all coatings and clean-up materials employed in emissions units K003 and K004, each, shall not exceed 0.156 tons per year.

Applicable Compliance Method:

The annual emissions limitation was established to reflect the actual worst-case annual particulate emissions rate (E) using the following equation for the paint spraying operations:

$E = (\text{coating material usage}) \times (\text{solids content}) \times (1-TE) \times (1-CE) / (2,000 \text{ lb/ton})$,
where:

Coating material usage = maximum coating usage (5,000 gal/yr)

Solids content = maximum solids content (8.31 lb solids/gal)

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 (62.5%)

CE = control efficiency of the control equipment (assumed to be 98%)

If required, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

f. Emissions Limitation:

Emissions from the internal ovens shall not exceed the following limits.

For K003:

0.023 lb PE/hr and 0.099 ton PE/yr

0.30 lb NO_x/hr and 1.314 tons NO_x/yr

0.252 lb CO/hr and 1.104 tons CO/yr

0.002 lb SO₂/hr and 0.008 ton SO₂/yr

For K004:

0.015 lb PE/hr and 0.066 ton PE/yr

0.20 lb NO_x/hr and 0.876 ton NO_x/yr

0.168 lb CO/hr and 0.736 ton CO/yr

0.001 lb SO₂/hr and 0.005 ton SO₂/yr

Applicable Compliance Method:

Compliance with the hourly emissions limitations shall be determined by multiplying the maximum hourly MMBtu capacity of the emissions unit (3.0 MMBtu/hr for K003 and 2.0 MMBtu/hr for K004) by the emission factor from AP-42, Fifth Edition, Section 1.4, Tables 1.4-1 and 1.4-2 (revised 7/98) for the combustion of natural gas (0.0075 lb PE/MMBtu, 0.10 lb NO_x/MMBtu, 0.084 lb CO/MMBtu, and 0.0006 lb SO₂/MMBtu). The annual emissions limitations are



the potentials-to-emit based on the allowable hourly emission rates multiplied by 8,760 hr/yr and divided by 2,000 lb/ton.

If required, the permittee shall demonstrate compliance with the hourly limitations in accordance with Methods 1-5, 7, 10, and 19 in 40 CFR Part 60 Appendix A.

g. Emissions Limitation:

VOC emissions from K001-K004, K006, and P001, combined, shall not exceed 34.1 tons per year from coating and clean-up material usage based on a rolling, 12-month summation of the emissions.

Applicable Compliance Method:

h. Compliance with this emissions limitation shall be demonstrated through the recordkeeping requirements established in d)(8) above.

g) Miscellaneous Requirements

(1) None.

3. K006, Booth #6

Operations, Property and/or Equipment Description:

Booth #6, paint spray booth with HVLP spray gun, drying oven and filter

- 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)i., d)(10) through d)(13), and e)(5)
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)h., c)(4) through c)(8), d)(8), d)(9), e)(3), and f)(1)e.
- 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 3745-17-07(A)(1) | Visible particulate emissions from any stack serving this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as specified by rule. |
| b. | OAC rule 3745-17-10(B)(1) | Particulate emissions (PE) shall not exceed 0.020 lb/MMBtu of actual heat input from any indirect-fired oven associated with this emissions unit. |
| c. | OAC rule 3745-17-11(C) | See c)(1), c)(2), and d)(1) through d)(5) below. |
| d. | OAC rule 3745-21-09(U)(2)(e)(iii) | See b)(2)a. below. |
| e. | OAC rule 3745-31-05(A)(3) [Best available technology for VOC] | <p>Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 26.74 pounds per hour and 17.62 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC</p> |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|---|--|
| | | rule 3745-31-05(D). See b)(2)b. and c)(3) below. |
| f. | OAC rule 3745-31-05(A)(3) [Best available technology for PE, NO _x , CO, and SO ₂] | PE from all coatings and clean-up materials employed in this emissions unit shall not exceed 0.156 tons per year. Emissions from the internal ovens shall not exceed the following limits: 0.015 lb PE/hr and 0.066 ton PE/yr 0.20 lb NO _x /hr and 0.876 ton NO _x /yr 0.168 lb CO/hr and 0.736 ton CO/yr 0.001 lb SO ₂ /hr and 0.005 ton SO ₂ /yr See b)(2)b. and b)(2)c. below. |
| g. | OAC rule 3745-31-05(A)(3)(a)(ii) | The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM ₁₀ , PM _{2.5} , NO _x , CO, and SO ₂ emissions from this air contaminant source because the controlled potentials to emit are less than 10 tons per year. See b)(2)d. below. |
| h. | OAC rule 3745-31-05(D) [Federally enforceable restriction to avoid Title V] | VOC emissions from K001-K004, K006, and P001, combined, shall not exceed 34.1 tons per year from coating and clean-up material usage based on a rolling, 12-month summation of the emissions. See B.2. through B.7. of the Facility-Wide Terms and Conditions above and c)(4) through c)(8) below. |
| i. | ORC 3704.03(F)(3)(c) and (F)(4) [Toxic Air Contaminant Statute] | See d)(10) through d)(13) and e)(5) below. |

(2) Additional Terms and Conditions

- a. The permittee shall not employ more than ten gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.
- b. The hourly and annual VOC, PE, NO_x, CO, and SO₂ limits were established to reflect the potentials-to-emit, taking into account the facility-wide restriction of

10,000 gallons coating and 350 gallons clean-up materials used per rolling, 12-month period. It is not necessary to develop monitoring, recordkeeping, or reporting requirements to ensure compliance with these limitations.

- c. This BAT emissions limitation applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- d. This requirement applies once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- (3) For each emissions unit, coating usage shall not exceed 417 gallons per month.
- (4) The usage of coating materials for emissions units K001-K004, K006, and P001, combined, shall not exceed 10,000 gallons per rolling, 12-month period.
- (5) The usage of clean-up materials for emissions units K001-K004, K006, and P001, combined, shall not exceed 350 gallons per rolling, 12-month period.
- (6) The VOC content of coatings employed in emissions units K001-K004, K006, and P001 shall not exceed 6.57 pounds VOC per gallon, as applied.
- (7) The VOC content of clean-up materials employed in emissions units K001-K004, K006, and P001 shall not exceed 6.8 pounds VOC per gallon, as applied.
- (8) The individual HAP content of coatings employed in emissions units K001-K004, K006, and P001 shall not exceed 1.22 pounds HAP per gallon, as applied.

d) Monitoring and/or Recordkeeping Requirements

- (1) 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 Ohio EPA, Central District Office upon request.
- (2) 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, the permittee shall maintain a copy of the manufacturer's recommended inspection frequency, and it shall be made available to the Ohio EPA upon request.

- (3) 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.
- (4) 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 the 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 Ohio EPA, Central District Office upon request.

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations, with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (6) The permittee shall collect and record the following information each day for each coating line when coating miscellaneous metal parts and products:
 - a. the name and identification number of each coating employed in the coating line;
 - b. the volume, in gallons, of each coating employed in the coating line; and
 - c. the total volume, in gallons, of all of the coatings employed in the coating line.
- (7) The permittee shall maintain monthly records of the total gallons of coatings employed in emissions unit K006.
- (8) The permittee shall maintain monthly records of the following information for emissions units K001-K004, K006, and P001 for the purpose of demonstrating compliance with the federally enforceable restriction on VOC emissions:
 - a. the identification of each coating and clean-up material employed;

- b. the total number of gallons of each coating and clean-up material employed;
 - c. the VOC content of each coating and clean-up material employed, in pounds per gallon;
 - d. the total gallons of coatings employed in emissions units K001-K004, K006, and P001, combined;
 - e. the total gallons of clean-up materials employed in emissions units K001-K004, K006, and P001, combined;
 - f. the total VOC emissions from all coatings and clean-up materials employed in emissions units K001-K004, K006, and P001, combined, in tons per month;
 - g. the rolling, 12-month summation of coating usage in emissions units K001-K004, K006, and P001, combined, in gallons; and
 - h. the rolling, 12-month summation of VOC emissions from all coating and clean-up materials employed in emissions units K001-K004, K006, and P001, combined, in tons.
- (9) The permittee shall collect and record the following information each month for all materials containing any HAP¹ that is applied in the emissions unit:
- a. the name and identification number/code of each coating, thinner, additive, clean-up material, and any other material containing any HAP;
 - b. the name/identification of each individual HAP contained in each material applied (and identified in “a” above) and the pounds of each HAP per gallon of each HAP-containing material applied;
 - c. the number of gallons of each coating, thinner, additive, clean-up material, and other material applied during the month;
 - d. 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 “b” times “c” for all the materials applied during the month, divided by 2,000 pounds;
 - e. 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” above;
 - f. 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” above, for the present month plus the previous 11 months of operation, in tons; and
 - g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in “e” above, for the present month plus the previous 11 months of operation, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting Ohio EPA, Central District Office. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

- (10) The permit application for this/these emissions unit(s), K001-K004, K006, and P001, combined, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or another 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 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., 24 hours per day and 7 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 MAGLC:
$$\text{TLV}/10 \times 8/X \times 5/Y = 4 \text{ TLV}/XY = \text{MAGLC}$$
 - d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tpy) or "worst case" toxic contaminant:

Toxic Contaminant: xylene (worst case; also toluene and MIBK)

TLV (mg/m³): 435

Maximum Hourly Emission Rate (lb/hr): 14.64

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 1,196

MAGLC (µg/m³): 10,357

The permittee, has demonstrated that emissions of xylene, from emissions unit(s) K001-K004, K006, and P001, combined, is calculated to be less than eighty percent of the 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).

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

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final permit 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.

- (12) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the 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.
- (13) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) 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 Air Services. In the event of an alternative hard copy submission in lieu of Air Services, 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 Central District Office, 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.
 - (2) 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 PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
 - (3) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month limitation of coating usage in emissions units K001-K004, K006, and P001, combined;
 - ii. all exceedances of the VOC content limitations on the coatings and clean-up materials employed in emissions units K001-K004, K006, and P001;
 - iii. all exceedances of the individual HAP content limitation on the coatings employed in emissions units K001-K004, K006, and P001;
 - iv. all exceedances of the rolling, 12-month VOC emissions limitation;
- 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 Central District Office).

- (4) The permittee shall notify the Director (the Ohio EPA, Central District Office) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit established under OAC rule 3745-21-09(U)(2)(e)(iii). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Central District Office) within 45 days after the exceedance occurs.
 - (5) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual PER. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:



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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emissions Limitation:

PE shall not exceed 0.020 lb/MMBtu of actual heat input from any indirect-fired oven associated with this emissions unit.

Applicable Compliance Method:

If required, compliance with the PE emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emissions Limitation:

VOC emissions shall not exceed 26.74 pounds per hour from all coatings and clean-up materials employed in this emissions unit.

Applicable Compliance Method:

The hourly emissions limitation was established to reflect the potential to emit based on the information provided in the permit application as follows:

Hourly VOC emissions = [(coating material usage) x (VOC content of coating)] + [(clean-up material usage) x (VOC content of clean-up material)], where:

- Coating material usage = maximum hourly usage (2 gal/hr)
- VOC content of coating = maximum VOC content (6.57 lb VOC/gal)
- Clean-up material usage = maximum hourly usage (2 gal/hr)
- VOC content of clean-up material = maximum VOC content (6.8 lb VOC/gal)

d. Emissions Limitation:

VOC emissions shall not exceed 17.62 tons per year from all coatings and clean-up materials employed in this emissions unit.

Applicable Compliance Method:

The annual emissions limitation was established to reflect the potential to emit, taking into account the monthly gallon usage restriction as follows:

Annual VOC emissions = [[(coating material usage) x (VOC content of coating)] + [(clean-up material usage) x (VOC content of clean-up material)]] / (2,000 lb/ton), where:

Coating material usage = maximum annual usage (5,000 gal)
VOC content of coating = maximum VOC content (6.57 lb VOC/gal)
Clean-up material usage = maximum annual usage (350 gal)
VOC content of clean-up material = maximum VOC content (6.8 lb VOC/gal)

e. Emissions Limitation:

Emissions from the internal ovens shall not exceed the following limits:

0.015 lb PE/hr and 0.066 ton PE/yr
0.20 lb NO_x/hr and 0.876 ton NO_x/yr
0.168 lb CO/hr and 0.736 ton CO/yr
0.001 lb SO₂/hr and 0.005 ton SO₂/yr

Applicable Compliance Method:

Compliance with the hourly emissions limitations shall be determined by multiplying the maximum hourly MMBtu capacity of the emissions unit (3.0 MMBtu/hr for K003 and 2.0 MMBtu/hr for K004) by the emission factor from AP-42, Fifth Edition, Section 1.4, Tables 1.4-1 and 1.4-2 (revised 7/98) for the combustion of natural gas (0.0075 lb PE/MMBtu, 0.10 lb NO_x/MMBtu, 0.084 lb CO/MMBtu, and 0.0006 lb SO₂/MMBtu). The annual emissions limitations are the potentials-to-emit based on the allowable hourly emission rates multiplied by 8,760 hr/yr and divided by 2,000 lb/ton.

If required, the permittee shall demonstrate compliance with the hourly limitations in accordance with Methods 1-5, 7, 10, and 19 in 40 CFR Part 60 Appendix A.

f. Emissions Limitation:

VOC emissions from K001-K004, K006, and P001, combined, shall not exceed 34.1 tons per year from coating and clean-up material usage based on a rolling, 12-month summation of the emissions.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated through the recordkeeping requirements established in d)(8) above.

g) Miscellaneous Requirements

(1) None.

4. P001, Mixing Room

Operations, Property and/or Equipment Description:

Paint mixing room

- 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)c., d)(3) through d)(6), and e)(4)
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)b., c)(1), d)(1), d)(2), e)(3), and f)(1)b.
- 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) [Best available technology for VOC] | <p>Volatile organic compound (VOC) emissions shall not exceed 4.48 tons per year from all coatings mixed and clean-up materials employed in this emissions unit.</p> <p>See b)(2)a. and c)(1) below.</p> |
| b. | OAC rule 3745-31-05(D) [Federally enforceable restriction to avoid Title V] | <p>VOC emissions from K001-K004, K006, and P001, combined, shall not exceed 34.1 tons per year from coating and clean-up material usage based on a rolling, 12-month summation of the emissions.</p> <p>See B.2. through B.7. of the Facility-Wide Terms and Conditions above and c)(1) below.</p> |
| c. | ORC 3704.03(F)(3)(c) and (F)(4) [Toxic Air Contaminant Statute] | See d)(4) through d)(7) and e)(4) below. |

(2) Additional Terms and Conditions

- a. The hourly and annual VOC limits were established to reflect the potentials-to-emit, taking into account the facility-wide restriction of 10,000 gallons coating used per rolling, 12-month period. It is not necessary to develop monitoring, recordkeeping, or reporting requirements to ensure compliance with these limitations.

c) Operational Restrictions

- (1) The usage of coating materials for emissions units K001-K004, K006, and P001, combined, shall not exceed 10,000 gallons per rolling, 12-month period. The usage of coating materials in emissions unit P001 is included in the coating materials used in K001-K004 and K006.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the total gallons of coatings mixed in this emissions unit.
- (2) The permittee shall maintain monthly records of the following information for this emissions unit for the purpose of demonstrating compliance with the federally enforceable restriction on VOC emissions:
- a. the identification of each coating and clean-up material mixed;
 - b. the total number of gallons of each coating and clean-up material mixed;
 - c. the VOC content of each coating and clean-up material mixed, in pounds per gallon;
 - d. the total VOC emissions from all coatings and clean-up materials employed in emissions units K001-K004, K006, and P001, combined, in tons per month;
 - e. the rolling, 12-month summation of VOC emissions from all coating and clean-up materials employed in emissions units K001-K004, K006, and P001, combined, in tons.
- (3) The permittee shall collect and record the following information each month for all materials containing any HAP¹ that is applied in the emissions unit:
- a. the name and identification number/code of each coating, thinner, additive, clean-up material, and any other material containing any HAP;
 - b. the name/identification of each individual HAP contained in each material mixed (and identified in "a" above) and the pounds of each HAP per gallon of each HAP-containing material applied;
 - c. the number of gallons of each coating, thinner, additive, clean-up material, and other material mixed during the month;

- d. for each individual HAP, the total emissions from all the materials mixed, in tons, i.e., for each individual HAP, the summation of the products of “b” times “c” for all the materials mixed during the month, divided by 2,000 pounds;
- e. the total combined HAPs emissions from all the materials mixed during the month, in tons, i.e., the summation of all the individual HAPs emissions from “d” above;
- f. 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” above, for the present month plus the previous 11 months of operation, in tons; and
- g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in “e” above, for the present month plus the previous 11 months of operation, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting Ohio EPA, Central District Office. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

- (4) The permit application for this/these emissions unit(s), K001-K004, K006, and P001, combined, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or another 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 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., 24 hours per day and 7 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 MAGLC:

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

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tpy) or “worst case” toxic contaminant:

Toxic Contaminant: xylene (worst case; also toluene and MIBK)

TLV (mg/m³): 435

Maximum Hourly Emission Rate (lb/hr): 14.64

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 1,196

MAGLC (µg/m³): 10,357

The permittee, has demonstrated that emissions of xylene, from emissions unit(s) K001-K004, K006, and P001, combined, is calculated to be less than eighty percent of the MAGLC; any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (5) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower TLV than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a “modification” under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or

process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final permit prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the 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.
- (7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) 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 Air Services. In the event of an alternative hard copy submission in lieu of Air Services, 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 Central District Office, 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.

- (2) 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 PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping and/or testing requirements in this permit:
 - i. all exceedances of the VOC content limitations on the coatings and clean-up materials employed in emissions units K001-K004, K006, and P001;
 - ii. all exceedances of the individual HAP content limitation on the coatings employed in emissions units K001-K004, K006, and P001;
 - iii. all exceedances of the rolling, 12-month VOC emissions limitation;
 - 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 Central District Office).

- (4) 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 PER. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

VOC emissions shall not exceed 4.48 tons per year from all coatings mixed and clean-up materials employed in this emissions unit.

Applicable Compliance Method:

The annual emissions limitation was established to reflect the potential to emit, taking into account the federally enforceable gallon usage restrictions and VOC content restrictions as follows:

Annual VOC emissions = $[(\text{coating material usage}) \times (\text{VOC content of coating}) \times (\text{EF})] + [(\text{clean-up material usage}) \times (\text{VOC content of clean-up material})]$ / (2,000 lb/ton), where:

Coating material usage = maximum annual usage (10,000 gal)

VOC content of coating = maximum VOC content (6.57 lb VOC/gal)

EF = emission factor for evaporative losses from paint mixing (0.1 lb VOC/lb VOC in gallon)

Clean-up material usage = maximum annual usage (350 gal)

VOC content of clean-up material = maximum VOC content (6.8 lb VOC/gal)

b. Emissions Limitation:

VOC emissions from K001-K004, K006, and P001, combined, shall not exceed 34.1 tons per year from coating and clean-up material usage based on a rolling, 12-month summation of the emissions.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated through the recordkeeping requirements established in d)(2) above.

g) Miscellaneous Requirements

- (1) None.