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

9/27/2016

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
Yes	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Mike Sarver
TRIMOLD LLC
200 Pittsburgh Rd.
Circleville, OH 43113

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

Facility ID: 0165010125
Permit Number: P0121573
Permit Type: Initial Installation
County: Pickaway

Dear Permit Holder:

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

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

and

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

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

Sincerely,

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

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

Ohio EPA-CDO; Kentucky

PUBLIC NOTICE

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

Draft Air Pollution Permit-to-Install and Operate Initial Installation
TRIMOLD LLC
200 PITTSBURGH RD,,CIRCLEVILLE, OH 43113
ID#:P0121573
Date of Action: 9/27/2016
Permit Desc:Initial installation of a TVAA coating line (R009). The facility's synthetic minor strategy will be modified to include R009 and the limits will remain the same (less than 99.0 tpy VOC enforceable via VOC content restrictions and a formula-based gallon restriction)..
The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the ID # or: Pamela McCoy, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778

Permit Strategy Write-Up

1. Check all that apply:

   XSynthetic Minor Determination

   ___Netting Determination

2. Source Description:

   This permit is for the initial installation of 1 TVAA spray booth (R009). This source has VOC, PM_{10}, $PM_{2.5}$, and hazardous air pollutant (HAP) emissions.

3. Facility Emissions and Attainment Status:

   The facility, TriMold LLC, is located in Pickaway County, which is in full attainment for all National Ambient Air Quality Standards (NAAQS).

   The facility is maintaining federally enforceable restrictions to avoid PSD, Title V, and MACT. These facility-wide restrictions are 99.0 tons of VOC per year, 9.9 tons of any individual HAP per year, and 24.9 tons of all combined HAPs per year. These restrictions will be enforced with a VOC content and gallon usage operational restriction for coatings and clean-up materials in emissions units R003, R004, R006, R007, R008, and R009, combined, to maximize the facility's operational flexibility. The facility will shut down emissions unit R006 when it installs emissions unit R009.

4. Source Emissions:

   R009 is subject to OAC rule 3745-17-11(C) and will install, maintain, and operate a dry filtration system for the control of particulate matter. BAT was assigned in accordance with the February 7, 2014 guidance and is based on the potential-to-emit for VOC and the controlled potential-to-emit for PM_{10} and $PM_{2.5}$ as follows:

   VOC = ($VOC_{coating}$ + $VOC_{clean\text{-}up}$) = 8.0 ton/month, where:
   $VOC_{coating}$ = (4.1 gal/hr) x (5.32 lb/gal) x (730 hr/mo) / (2,000 lb/ton) = 7.96
   $VOC_{clean\text{-}up}$ = (13.75 gal/mo) x (6.71 lb/gal) / (2,000 lb/ton) = 0.04

   PM_{10}/$PM_{2.5}$ = [(Coating) x (Solids) x (1 – TE) x (1 – CE)] x (730 hr/mo) / (2,000 lb/ton) = 0.01 ton/month, where:
   Coating = Maximum hourly coating usage rate = 4.1 gal/hr
   Solids = Maximum solids content = 1.37 lb/gal
   TE = transfer efficiency = 0.70
   CE = filter control efficiency = 0.99

   Modeling was submitted to represent the potential-to-emit for all toxic air contaminants and shows that levels of air toxics fall below 80% of the MAGLCs.

5. Conclusion:

The issuance of P0121573 is recommended.

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

Pollutant	Tons Per Year
VOC	99.0
PM_{10}	0.12
$PM_{2.5}$	0.12
Individual HAP	9.9
Combined HAPs	24.9

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
TRIMOLD LLC

Facility ID:	0165010125
Permit Number:	P0121573
Permit Type:	Initial Installation
Issued:	9/27/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
TRIMOLD LLC

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Authorization

Facility ID: 0165010125
Application Number(s): A0056519
Permit Number: P0121573
Permit Description: Initial installation of a TVAA coating line (R009). The facility's synthetic minor strategy will be modified to include R009 and the limits will remain the same (less than 99.0 tpy VOC enforceable via VOC content restrictions and a formula-based gallon restriction).
Permit Type: Initial Installation
Permit Fee: $200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 9/27/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

TRIMOLD LLC
200 PITTSBURGH RD
CIRCLEVILLE, OH 43113

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: P0121573
Permit Description: Initial installation of a TVAA coating line (R009). The facility's synthetic minor strategy will be modified to include R009 and the limits will remain the same (less than 99.0 tpy VOC enforceable via VOC content restrictions and a formula-based gallon restriction).

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

Emissions Unit ID:	**R009**
Company Equipment ID:	TVAA Automatic Spray Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) 2. through 7.

2. In accordance with OAC rule 3745-31-05(D) to avoid Title V and PSD, the emissions of volatile organic compounds (VOC) from emissions units **R003**, **R004**, **R006**, **R007**, **R008**, **R009**, all de minimis emissions units as defined in OAC rule 3745-15-05, all registration status and all permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 99.0 tons per rolling, 12-month period.

3. In accordance with OAC rule 3745-31-05(D) to avoid MACT, the emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units **R003**, **R004**, **R006**, **R007**, **R008**, **R009**, all de minimis emissions units as defined in OAC rule 3745-15-05, all registration status and all 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.

4. Operational Restrictions

   a) The VOC content of coatings employed in emissions units **R003**, **R004**, **R006**, **R007**, **R008**, and **R009** shall not exceed 5.32 pounds per gallon, as applied;

   b) The VOC content of clean-up materials employed in emissions units **R003**, **R004**, **R006**, **R007**, **R008**, and **R009** shall not exceed 6.71 pounds per gallon.

   c) The individual and combined HAP contents of coatings employed in emissions units **R003**, **R004**, **R006**, **R007**, **R008**, and **R009** shall not exceed 0.48 pounds per gallon, as applied;

   d) The permittee shall not use clean-up materials that contain HAPs;

   e) The maximum coating usage in emissions units **R003**, **R004**, **R006**, **R007**, **R008**, and **R009**, combined, shall not exceed 33,000 gallons per rolling, 12-month period.

   f) The maximum clean-up material usage in emissions units **R003**, **R004**, **R006**, **R007**, **R008**, and **R009**, combined, shall not exceed 275 gallons per rolling, 12-month period.

5. Monitoring and/or Recordkeeping Requirements

a) The permittee shall maintain monthly records of the following information:

(1) the company identification for each coating and clean-up material employed in emissions units **R003**, **R004**, **R006**, **R007**, **R008**, and **R009**;

(2) the VOC content, individual HAP content, and combined HAP content of each coating and clean-up material employed in emissions units **R003**, **R004**, **R006**, **R007**, **R008**, and **R009**, in pounds per gallon;

(3) the number of gallons of each coating and clean-up material employed during the month in emissions units **R003**, **R004**, **R006**, **R007**, **R008**, and **R009**;

(4) the total VOC emissions from all of the coatings and clean-up materials employed during the month in emissions units **R003**, **R004**, **R006**, **R007**, **R008**, and **R009**, in tons;

(5) the total individual HAP and combined HAP emissions from all of the coatings and clean-up materials employed during the month in emissions units **R003**, **R004**, **R006**, **R007**, **R008**, and **R009**, in tons;

(6) the rolling, 12-month summation of the total number of gallons of coatings employed in emissions units **R003**, **R004**, **R006**, **R007**, **R008**, and **R009**;

(7) the rolling, 12-month summation of the total number of gallons of clean-up materials employed in emissions units **R003**, **R004**, **R006**, **R007**, **R008**, and **R009**;

(8) the rolling, 12-month summation of facility-wide VOC emissions, in tons;

(9) the rolling, 12-month summation of facility-wide individual HAP emissions, in tons; and

(10) the rolling, 12-month summation of facility-wide combined HAPs emissions, in tons.

6. Reporting Requirements

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

(1) All deviations (excursions) of the following emissions 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:

(a) all exceedances of the VOC content limitations on the coatings and clean-up materials employed in emissions units **R003**, **R004**, **R006**, **R007**, **R008**, and **R009**;

(b) all exceedances of the individual and combined HAP content limitations on the coatings and clean-up materials employed in emissions units **R003**, **R004**, **R006**, **R007**, **R008**, and **R009**;

(c) all exceedances of the rolling, 12-month coating and clean-up material usage limitations specified in B.4.e) and B.4.f) above;

(d) all exceedances of the facility-wide rolling, 12-month VOC emissions limitation;

(e) all exceedances of the facility-wide rolling, 12-month individual HAP emissions limitation; and

(f) all exceedances of the facility-wide rolling, 12-month combined HAPs emissions limitation.

(2) The probable cause of each deviation (excursion).

(3) Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).

(4) The magnitude 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 (Ohio EPA Central District Office).

7. Testing Requirements

a) Emissions Limitation:

The emissions of VOC from emissions units **R003**, **R004**, **R006**, **R007**, **R008**, **R009**, all de minimis emissions units as defined in OAC rule 3745-15-05, all registration status and all permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 99.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined in accordance with the recordkeeping requirements in B.5. above. Formulation data or U.S. EPA Method 24 (40 CFR part 60, Appendix A) shall be used to determine the organic compound content of the coatings.

b) Emissions Limitation:

In accordance with OAC rule 3745-31-05(D) to avoid MACT, the emissions of HAPs, as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units **R003**, **R004**, **R006**, **R007**, **R008**, **R009**, all de minimis emissions units as defined in OAC rule 3745-15-05, all registration status and all 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.

Applicable Compliance Method:

Compliance with these emissions limitations shall be determined in accordance with the recordkeeping requirements in B.5. above. Formulation data or U.S. EPA Method 24 (40 CFR part 60, Appendix A) shall be used to determine the organic compound content of the coatings.

C. Emissions Unit Terms and Conditions

1. R009, TVAA Automatic Spray Booth

Operations, Property and/or Equipment Description:

TVAA Automatic Spray Booth

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

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

a. b)(1)d., b)(1)f., b)(2)d., d)(6) through d)(9), and e)(3)

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

a. b)(1)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 3745-17-11(C)	See c)(1), c)(2), and d)(1) through d)(5) below.
b.	OAC rule 3745-31-05(A)(3) [Best Available Technology for VOC]	VOC emissions from all coatings and clean-up materials employed in this emissions unit shall not exceed 8.0 tons per month, averaged over a rolling, 12-month period. See b)(2)a. below.
c.	OAC rule 3745-31-05(A)(3) [Best Available Technology for PM_{10} and $PM_{2.5}$]	Emissions of particulate matter with a diameter less than 10 microns (PM_{10}) shall not exceed 0.01 ton per month, averaged over a rolling, 12-month period. Emissions of particulate matter with a diameter less than 2.5 microns ($PM_{2.5}$) shall not exceed 0.01 ton per month, averaged over a rolling, 12-month period.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)b. and b)(2)c. below.
d.	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} and $PM_{2.5}$ emissions from this air contaminant source because the controlled potentials to emit are less than 10 tons per year. See b)(2)d. below.
e.	OAC rule 3745-31-05(D) [Federally enforceable limitations to avoid PSD, Title V, and MACT]	See 2. through 7. of Section B – Facility-Wide Terms and Conditions above.
f.	ORC 3704.03(F)(4)(c) and (F)(4) [Toxic Air Contaminant Statute]	See d)(6) through d)(9) below.

(2) Additional Terms and Conditions

a. The monthly VOC emissions limitation for this emissions unit was established to reflect the maximum potential to emit. It is not necessary to develop additional monitoring, recordkeeping, and/or reporting requirements to ensure compliance with this limit.

b. The monthly PM_{10} and $PM_{2.5}$ emissions limitations for this emissions unit were established to reflect the maximum potentials to emit, taking into consideration the control requirements established under OAC rule 3745-17-11(C). The monitoring, recordkeeping, and reporting requirements for the dry filtration system as established in the following terms and conditions are sufficient to demonstrate compliance with these limits.

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) as part of the Ohio SIP.

c) Operational Restrictions

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

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manual(s) 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 manual(s) 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 (5) 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 units 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 permit application for this emissions unit, **R009**, was evaluated based upon the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit 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 emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, ISCST3, or other Ohio EPA approved model. The predicted 1-

hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

   ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is/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., "X" is 24 hours per day and "Y" is 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 Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: Methanol
TLV (mg/m^3): 262
Maximum Hourly Emission Rate (lb/hr): 1.979
Predicted 1-Hour Maximum Ground-Level Concentration ($\mu g/m^3$): 43.30
MAGLC ($\mu g/m^3$): 6,238

Toxic Contaminant: Cyclohexane
TLV (mg/m^3): 344
Maximum Hourly Emission Rate (lb/hr): 11.31
Predicted 1-Hour Maximum Ground-Level Concentration ($\mu g/m^3$): 247.6
MAGLC ($\mu g/m^3$): 8,190

The permittee, has demonstrated that emissions of methanol and cyclohexane from emissions unit **R009**, 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).

(7) Prior to making any physical changes to, or changes in the method of operation of, the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

If the permittee determines that the "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.

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

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit 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 or the materials applied.

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

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

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

f) Testing Requirements

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

a. Emissions Limitation:

VOC emissions from coatings and clean-up materials employed in this emissions unit shall not exceed 8.0 tons per month, averaged over a rolling, 12-month period.

Applicable Compliance Method:

Compliance with the monthly VOC emissions limitation shall be demonstrated using the following equations, which account for the maximum coating and clean-up material VOC contents, the maximum hourly coating usage rate and the maximum monthly clean-up material usage rate based on information provided in the permittee's application.

$VOC = (VOC_{coating} + VOC_{clean\text{-}up})$, where:

$VOC_{coating}$ = (4.1 gal/hr) x (5.32 lb/gal) x (730 hr/mo) / (2,000 lb/ton)

$VOC_{clean\text{-}up}$ = (13.75 gal/mo) x (6.71 lb/gal) / (2,000 lb/ton)

b. Emissions Limitations:

PM_{10} emissions shall not exceed 0.01 ton per month, averaged over a rolling, 12-month period (as applicable prior to U.S. EPA approving OAC rule 3745-31-05(A)(3)(a)(ii) as part of the SIP).

$PM_{2.5}$ emissions shall not exceed 0.01 ton per month, averaged over a rolling, 12-month period (as applicable prior to U.S. EPA approving OAC rule 3745-31-05(A)(3)(a)(ii) as part of the SIP).

Applicable Compliance Method:

Compliance with the monthly PM_{10} and $PM_{2.5}$ emissions limitations shall be demonstrated using the following equation, which accounts for the maximum coating solids content, the maximum hourly coating usage rate, the maximum solids content of the coatings, the particulate transfer efficiency and control efficiency based on information provided in the permittee's application.

$PM_{10}/PM_{2.5}$ = [(Coating) x (Solids) x (1 – TE) x (1 – CE)] x (730 hr/mo) / (2,000 lb/ton), where:

Coating = Maximum hourly coating usage rate = 4.1 gal/hr
Solids = Maximum solids content = 1.37 lb/gal
TE = transfer efficiency = 0.70
CE = filter control efficiency = 0.99

g) Miscellaneous Requirements

(1) None.