



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

10/24/2016

Genevieve Damico *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: Airstream, Inc.
Facility ID: 0575000095
Permit Type: Minor Permit Modification
Permit Number: P0121254

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. 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. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-2835 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

A handwritten signature in black ink that reads "Michael E. Hopkins".

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

Cc: Ohio EPA DAPC, Southwest District Office



PROPOSED

Division of Air Pollution Control Title V Permit for Airstream, Inc.

Facility ID:	0575000095
Permit Number:	P0121254
Permit Type:	Minor Permit Modification
Issued:	10/24/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Airstream, Inc.

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Proposed Title V Permit
Airstream, Inc.
Permit Number: P0121254
Facility ID: 0575000095

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0575000095
Facility Description: Manufactures recreational vehicles
Application Number(s): A0056314
Permit Number: P0121254
Permit Description: Title V PTO minor permit modification to address changes in emissions units P002, P005, P006, and P007 that were reviewed and covered under PTI P0118951 that was issued final on 6/3/15.
Permit Type: Minor Permit Modification
Issue Date: 10/24/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0108279

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Airstream, Inc.
419 West Pike Street
Jackson Center, OH 45334

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

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

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Southwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Proposed Title V Permit
Airstream, Inc.
Permit Number: P0121254
Facility ID: 0575000095
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

- c) The permittee shall submit required reports in the following manner:
- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Southwest District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Southwest District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Southwest District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.

- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
- (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible

Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Southwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Southwest District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.
 - b. The permittee's current compliance status.

- c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Southwest District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Southwest District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the Ohio EPA DAPC, Southwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southwest District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention Requirements Under State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine



whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Southwest District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



Proposed Title V Permit
Airstream, Inc.
Permit Number: P0121254
Facility ID: 0575000095

Effective Date: To be entered upon final issuance

30. Submitting Documents Required by this Permit

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 Ohio EPA DAPC, Southwest 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 Responsible Official may be represented as provided through procedures established in Air Services.



Proposed Title V Permit
Airstream, Inc.
Permit Number: P0121254
Facility ID: 0575000095

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) None.

1. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units B001, K002 thru K004, K006, P002, P004 thru P006, P007, and R001 thru R003, along with other de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 tons per year (TPY) for any individual HAP and 24.9 TPY for the combination of all HAPs, based upon rolling, 12-month summations.

[Authority for term: OAC rules 3745-77-07(A)(1)]

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

- a) the company identification for each HAP-emitting material (i.e., all HAP-containing coatings, clean-up materials, resins, adhesives, potting compounds, plating chemicals, etc.);
- b) the individual HAP content of each HAP emitting material;
- c) the total combined HAP content of each HAP emitting material (i.e. sum of individual HAP contents from b);
- d) the amount of each HAP emitting material employed;
- e) the hours of operation, or other emissions determining rationale, of individual HAP-generating sources (e.g., fuel combustion, sanding/grinding operations, plating);
- f) the amount of combined HAP emitting material employed;
- g) the total individual HAP emissions from all HAP-emitting materials employed (b times d) and all HAP-generating sources, in pounds or tons per month (summation of the e);
- h) the hours of operation, or other emissions determining rationale, of combined HAP-generating sources (e.g., fuel combustion, sanding/grinding operations, plating);
- i) the total combined HAP emissions from all HAP emitting materials employed (c times f) and all combined HAP-generating sources, in pounds or tons per month (summation of the h);
- j) the rolling, 12-month summation of individual HAP emissions from all HAP-emitting materials employed (summation of g) and all individual HAP-generating sources (summation of g), in tons; and
- k) the rolling, 12-month summation of total combined HAP emissions from all HAP-emitting materials employed (summation of i) and all HAP-generating sources, in tons (summation of i).

[Authority for term: OAC rules 3745-77-07(C)(1)]



3. The permittee shall submit quarterly deviation (excursion) reports for the following emissions unit(s) that identify:
- a) the rolling 12 individual HAP emissions is greater than 9.9 tons listed in 2; and
 - b) the rolling 12-month combined HAP's emissions are greater than 24.9 tons listed in 2.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rules 3745-77-07(C)(1)]

4. Unless other arrangements have been approved by the director, all notifications and reports shall be submitted thru the Ohio EPA's eBusiness Center: Air Services online web portal.
5. Compliance with the emission limitations in 2. of these terms and conditions shall be determined in accordance with the following method:

- a) Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling 12-month summation for the emissions units listed in 2.

Applicable Compliance Method:

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

[Authority for term: OAC rules 3745-77-07(C)(1)]



Proposed Title V Permit
Airstream, Inc.
Permit Number: P0121254
Facility ID: 0575000095
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group - Main Building Spray booths: K002, K003, K004,

EU ID	Operations, Property and/or Equipment Description
K002	West Spray Booth, Miscellaneous Metal Coating Operation w/ natural gas fired drying ovens
K003	East Spray Booth, Miscellaneous Metal Coating w/ natural gas fired drying oven
K004	Chassis Paint Line

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) b)(1)f., d)(8) thru d)(11) and e)(4).
- 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) (PTI P0120432 issued 9/2/20016)	Volatile organic compound (VOC) shall not exceed 7.0 pounds per hour, excluding cleanup materials. VOC content shall not exceed 3.04 lbs/gallon of liquid organic cleanup materials. Emissions from natural gas combustion in the drying oven (1.2 mmBtu/hr): 0.12 lb/hr and 0.53 ton/yr NO _x ; 0.1 lb/hr and 0.36 ton/yr CO; 0.002 lb/hr and 0.01 ton/yr filterable PM; 0.007 lb/hr and 0.03 ton/yr VOC; and 0.0001 lb/hr and 0.0004 ton/yr SO ₂ . See b)(2)a. The requirements of this rule also includes compliance with the requirements of OAC rules 3745-31-05(D), 3745-21-09(U), 3745-17-10, and 3745-17-07(A).
b.	OAC rule 3745-31-05(D)	VOC emissions shall not exceed 35.5 tons per rolling, 12-month summation with cleanup materials.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-21-09(U)	The VOC content of the coating materials employed in this emissions unit shall not exceed 3.5 lbs/gallon, as applied.
d.	OAC rule 3745-17-10	The particulate emissions from the burning natural gas in the drying oven shall not exceed 0.020 pound per million Btu of actual heat input.
e.	OAC rule 3745-17-07(A)	Visible Particulate Emissions (PE) shall not exceed 20% as a six-minute average, except as provided by rule.
f.	OAC rule 3745-114-01	Ohio Toxic Rule See d)(8) thru d)(11), and e)(4) below.
g.	OAC rule 3745-17-11(C)	See c)(3), c)(4), d)(3) thru d)(7) and e)(3)f.

(2) Additional Terms and Conditions

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

c) Operational Restrictions

(1) Coating employed in this emission unit shall not exceed: 18,396 gallons per rolling 12-month period and VOC content shall not exceed 3.5 pounds per gallon of coating and additives, excluding water and exempt solvent.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(D) and PTI # P0120432]

(2) Liquid Organic Cleanup Materials employed in this emission unit shall not exceed: 2190 gallons per rolling 12-month period and VOC content shall not exceed 3.04 pounds per gallon of material employed.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(D) and PTI # P0120432]

(3) The permittee shall operate the filter system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The filter system shall be employed during all periods of coating application to control particulate emissions.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-17-11(C) and PTI # P0120432]

- (4) 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.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-17-11(C) and PTI # P0120432]

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

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

- a. the name and identification of each coating and cleanup material employed
- b. the VOC content of each coating, in pounds per gallon, excluding water and exempt solvents;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the number of gallons of each coating and cleanup material employed;
- e. the 12-month rolling gallons of all coating and cleanup material employed;
- f. the month total VOC emissions from all coatings and cleanup materials employed, in tons; and
- g. the 12-month rolling total VOC emissions from all coatings and cleanup materials employed, in tons.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(D) and PTI # P0120432]

- (2) The permittee shall maintain records on any time that fuel other than natural gas is employed in the drying oven.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI # P0120432]

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the filter system with any modifications deemed necessary by the permittee during the time period in which the filter is utilized. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-11(C) and PTI # P0120432]

- (4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be

based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-11(C) and PTI # P0120432]

- (5) 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.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-11(C) and PTI # P0120432]

- (6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-11(C) and PTI # P0120432]

- (7) 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.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-11(C) and PTI # P0120432]

- (8) The permit-to-install (PTI) application for this/these emissions unit(s), K002, K003, and K004, 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 other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

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

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

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

Toxic Contaminant: Ethyl Benzene w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m³): 433 (*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 0.34 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 82

MAGLC (ug/m³): 10,301

Toxic Contaminant: Xylenes w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m³): 433 (*for which toxic, if using worst case)



Maximum Hourly Emission Rate (lbs/hr): 1.03 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 221

MAGLC (ug/m3): 10,301

Toxic Contaminant: Toluene w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 188 (*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 1.30 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 263

MAGLC (ug/m3): 4,480

The permittee, has demonstrated that emissions of the individual toxic contaminants, pursuant to OAC rule 3745-114-01, from emissions unit(s) K002, K003, and K004, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-114-01 and PTI # P0120432]

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

If the permittee determines that the "Toxic Air Contaminant Statute" 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 PTI 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.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-114-01 and PTI # P0120432]

- (10) 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(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.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-114-01 and PTI # P0120432]

- (11) 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.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-114-01 and PTI # P0120432]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI # P0120432]

- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office, Division of Air Pollution Control) within 30 days following the end of the calendar month.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-21-09(B), and PTI # P0120432]

- (3) The permittee shall submit quarterly deviation reports that identify the following:
- a. all exceedances of the rolling, 12-month period coating and additive usage limitation of 18,396 gallons excluding water and exempt solvents;
 - b. all exceedances of coating VOC content of 3.5 lbs/gal;
 - c. all exceedances of the rolling, 12-month period cleaning solvent usage limitation of 2,190 gallons;
 - d. all exceedances of liquid clean up VOC content of 3.04 lbs/gal;
 - e. all exceedances of the rolling, 12-month period VOC emission limitation of 35.5 tons; and/or
 - f. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

These quarterly deviation reports are due by the dates specified in the standard terms and conditions of this permit.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(D) and PTI # P0120432]

- (1) The permittee shall submit annual reports that include any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the "Toxic Air Contaminate Statute", ORC 3704.03(F), through the predicted 1 hour maximum concentration. The report should include:
- a. the original model input;
 - b. the updated model input;
 - c. the reason for the change(s) to the input parameter(s); and



- d. a summary of the results of the updated modeling, including the input changes; and
- e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

If no changes to the emissions, emissions unit(s), or the exhaust stack have been made during the reporting period, then the report shall include a statement to that effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-114-01 and PTI # P0120432]

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI # P0120432]

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI # P0120432]

f) Testing Requirements

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

- a. Emission Limitation:

35.5 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

The above emissions limitation is based on the following equation:

$$AER = [(Cu \times Cvoc) + (CLu \times CLvoc)] \times 2000$$

Where:

AER = Annual VOC emissions, in tons per 12 month period;

Cu = Coating usage rate, in gallons per year;

Cu = 2.1 gallons per hour x 8760 hrs/yr = 18,396 gallons per year;

Cvoc = Coating VOC content, in pounds per gallon, (3.5);



CLu = Cleanup usage, in gallons per year;

CLu = 0.25 gallon per hour x 8760 hrs/yr = 2,190 gallons per year;

CLvoc = Cleanup VOC content, in pounds per gallon, (3.04);

AER = [(18,396 gal/yr x 3.5 lbs/gal) + (2,190 gal/yr x 3.04 lbs/gal)]/2000; and

AER = 35.5 tons of VOC/12 month rolling.

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Section d) of this permit.

Formulation data or Method 24 of 40 CFR, Part 60, Appendix A, shall be used to determine the organic compound contents of the materials employed.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(D), and PTI # P0120432]

b. Emission Limitation:

The VOC content of the coating materials employed in this emissions unit shall not exceed 3.5 lbs/gallon, as applied.

The VOC content of liquid organic cleanup materials employed in this emissions unit shall not exceed 3.04 lbs/gallon, as applied.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Section d), of this permit.

Formulation data or Method 24 of 40 CFR, Part 60, Appendix A, shall be used to demonstrate compliance with the organic compound content limitations.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-21-09(U), and PTI # P0120432]

c. Emissions Limitation:

0.020 pound per million Btu of actual heat input

Applicable Compliance Method:

Compliance shall be based on the use of natural gas and the record keeping in section d) of this permit.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-10, and PTI # P0120432]



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- d. Emissions from natural gas usage in the drying oven shall not exceed the following:

0.12 lb NOx/hr and 0.53 ton NOx/yr;

0.1 lb CO/hr and 0.44 ton CO/yr;

0.002 lb PE/hr (filterable) and 0.01 ton PE/yr (filterable);

0.007 lb VOC/hr; and 0.03 ton VOC/yr; and

0.0001 lb SO2/hr; and 0.0004 ton SO2/yr.

The above limitations are based on the following equation:

$$HER = (Bi / 1000 \text{ btu/cu ft}) \times Ef$$

$$MAR = \{[HER \times 8760] / 2000\}$$

Where:

HER = Hourly emission rate, in pounds per hour;

MAR = Yearly emissions rate, in tons per year;

Bi= Burner heat input, in mmbtu/hr, (1.2 from EAC form); and

Ef = Emissions factor, in pounds emitted per mmscf:

100 pounds of NOx, (AP-42, Table 1.4-1);

84 pounds of CO, (AP-42, Table 1.4-1);

1.9 pounds of PE filterable, (AP-42, Table 1.4-2);

5.5 pounds of VOC, (AP-42, Table 1.4-2); and

0.6 pound of SO2, (AP-42, Table 1.4-2).

Applicable Compliance Method:

Compliance shall be based on the use of natural gas as fuel in the drying oven and the record keeping established in section d) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI # P0120432]

- e. Emission Limitation:

Visible Particulate Emissions (PE) shall not exceed 20% as a six-minute average, except as provided by rule.



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Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A), and PTI # P0120432]

g) Miscellaneous Requirements

(1) None.



2. K006, Window Paint Spray Booth

Operations, Property and/or Equipment Description:

Window Line Spray Booth with paper paint booth filters

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)e., d)(7), d)(8), d)(9), d)(10), and e)(3) below.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC 3745-31-05(A)(3) (PTI P0120432 issued 9/2/20016)	VOC content shall not exceed 3.04 lbs/gallon of liquid organic cleanup materials. The requirements of this rule also includes compliance with the requirements of OAC rule 3745-31-05(D), 3745-21-09(U), and 3745-17-07(A).
b.	OAC rule 3745-31-05(D) (to avoid PSD)	Total combined VOC from the coating and cleanup operations shall not exceed 34 tons per rolling, 12-month period.
c.	OAC rule 3745-21-09(U)	The VOC content of the coating materials employed in this emissions unit shall not exceed 3.5 lbs/gallon, as applied.
d.	OAC rule 3745-17-07(A)	Visible Particulate Emissions (PE) shall not exceed 20% as a six-minute average, except as provided by rule.
e.	OAC rule 3745-114-01	Ohio Toxic Rule See d)(7), d)(8), d)(9), d)(10), and e)(3) below.
f.	OAC rule 3745-17-11(C)	See c)(3), c)(4), d)(2) thru d)(6), and e)(2)f.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

- (1) Coating employed in this emission unit shall not exceed: 17,520 gallons per rolling 12-month period and VOC content shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvent.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(D), and PTI # P0120432]

- (2) Liquid Organic Cleanup Materials employed in this emission unit shall not exceed: 2190 gallons per rolling 12-month period and VOC content shall not exceed 3.04 pounds per gallon of material employed.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(D), and PTI # P0120432]

- (3) 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.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-17-11(C), and PTI # P0120432]

- (4) 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.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-17-11(C), and PTI # P0120432]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month:

- a. the name and identification of each coating and cleanup material employed;
- b. the VOC content of each coating, in pounds per gallon, excluding water and exempt solvents;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the number of gallons of each coating and cleanup material employed;
- e. the 12-month rolling gallons of all coating and cleanup material employed;
- f. the month total VOC emissions from all coatings and cleanup materials employed, in tons; and
- g. the 12-month rolling total VOC emissions from all coatings and cleanup materials employed, in tons.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(D), and PTI # P0120432]

- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the filter system with any modifications deemed necessary by the permittee during the time period in which the filter is utilized. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-11(C), and PTI # P0120432]

- (3) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-11(C), and PTI # P0120432]

- (4) 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.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-11(C), and PTI # P0120432]

- (5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-11(C), and PTI # P0120432]

- (6) 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.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-11(C), and PTI # P0120432]

(7) The permit-to-install (PTI) application for this/these emissions unit(s), K006, 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 other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

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

TLV (mg/m3): 434 (*for which toxic, if using worst case)



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Maximum Hourly Emission Rate (lbs/hr): 0.47 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 50

MAGLC (ug/m3): 10,322

Toxic Contaminant: Toluene w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 188 (*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 1.35 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 138

MAGLC (ug/m3): 4,480

The permittee, has demonstrated that emissions of the individual toxic contaminants, pursuant to OAC rule 3745-114-01, from emissions unit(s) K006, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-114-01, and PTI # P0120432]

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

If the permittee determines that the "Toxic Air Contaminant Statute" 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 PTI 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.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-114-01, and PTI # P0120432]

- (9) 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(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.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-114-01, and PTI # P0120432]

- (10) 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.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-114-01, and PTI # P0120432]

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the

Ohio EPA, Southwest District Office, Division of Air Pollution Control) within 30 days following the end of the calendar month.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-21-09(B), and PTI # P0120432]

- (2) The permittee shall submit quarterly deviation reports that identify the following:
- a. all exceedances of the rolling, 12-month period coating usage limitation of 17,520 gallons excluding water and exempt solvents;
 - b. all exceedances of the rolling, 12-month period cleaning solvent usage limitation of 2,190 gallons;
 - c. all exceedances of coating material VOC content of 3.5 lbs/gal;
 - d. all exceedances of liquid clean up VOC content of 3.04 lbs/gal;
 - e. all exceedances of the rolling, 12-month period VOC emission limitation of 34 tons; and
 - f. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

These quarterly deviation reports are due by the dates specified in the standard terms and conditions of this permit.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-114-01, and PTI # P0120432]

- (3) The permittee shall submit annual reports that include any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the "Toxic Air Contaminate Statute", ORC 3704.03(F), through the predicted 1 hour maximum concentration. The report should include:
- a. the original model input;
 - b. the updated model input;
 - c. the reason for the change(s) to the input parameter(s); and
 - d. a summary of the results of the updated modeling, including the input changes; and
 - e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

If no changes to the emissions, emissions unit(s), or the exhaust stack have been made during the reporting period, then the report shall include a statement to that effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.



[Authority for term: OAC rules 3745-77-07(C)(1), 3745-114-01, and PTI # P0120432]

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI # P0120432]

- (5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rules 3745-77-07(C)(1) and PTI # P0120432]

f) Testing Requirements

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

a. Emission Limitation:

34.0 tons of VOC per rolling, 12-month rolling period

Applicable Compliance Method:

The above emission limitation is based on the following equation:

$$AER = [(Cu \times Cvoc) + (CLu \times CLvoc)] \times 2000$$

Where:

AER = Annual VOC emissions, in tons per 12- month rolling period;

Cu = Coating usage rate, in gallons per year:

$$Cu = 2 \text{ gallons per hour} \times 8760 \text{ hrs/yr} = 17,520 \text{ gallons per year};$$

Cvoc = Coating VOC content, in pounds per gallon, (3.5);

CLu = Cleanup usage, in gallons per year: and

$$CLu = 0.25 \text{ gallons per hour} \times 8760 \text{ hrs/yr} = 2,190 \text{ gallons per year.}$$

CLvoc = Cleanup VOC content, in pounds per gallon, (3.04).

$$AER = [(17,520 \text{ gal/yr} \times 3.5 \text{ lbs/gal}) + (2,190 \text{ gal/yr} \times 3.04 \text{ lbs/gal})] / 2000$$

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Section d), of this permit.



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Formulation data or Method 24 of 40 CFR, Part 60, Appendix A, shall be used to determine the organic compound contents of the materials employed.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(D), and PTI # P0120432]

b. Emission Limitation:

The VOC content of the coating materials employed in this emissions unit shall not exceed 3.5 lbs/gallon, as applied.

The VOC content of liquid organic cleanup materials employed in this emissions unit shall not exceed 3.04 lbs/gallon, as applied.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Section d) of this permit.

Formulation data or Method 24 of 40 CFR, Part 60, Appendix A, shall be used to demonstrate compliance with the organic compound content limitations.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-21-09(U), and PTI # P0120432]

g) Miscellaneous Requirements

- (1) None.



3. P002, Wood Shop/Bldg.102

Operations, Property and/or Equipment Description:

Wood Shop

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(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) June 30, 2008 (P0118951 issued on 6/3/2015)	Install a Fabric Filter Baghouse with a design control efficiency of at least 95% control, by weight, for particulate emissions (PE) emissions of particulate matter 10 microns and less in diameter (PM10), and emissions of particulate matter 2.5 microns and less in diameter (PM2.5). See b)(2)a., below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A) do not apply to the PE, PM10, and PM2.5 emissions from this air contaminant source since the potential to emit is less than 10 tons per year. See b)(2)b., below.
c.	OAC rule 3745-17-11(B)(2)	7.4 lbs. of particulate emissions (PE)/ hour.
d.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit 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).

- b. These requirements apply 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 dust control system whenever this emissions unit is in operation.

[Authority for term: OAC rules 3745-77-07(A)(1) and PTI #P0118951]

- (2) In order to ensure the source continues to operate as designed; the permittee shall operate this emissions unit in accordance with manufacturer's recommendations and shall follow the manufacturer's recommended maintenance, at the recommended intervals. The permittee shall keep a record of the maintenance on this emissions unit along with manufacturer's recommendations.

[Authority for term: OAC rules 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records that document any time periods when the dust control system serving as PE control for this emissions unit was not in service while this emissions unit was operating.

[Authority for term: OAC rules 3745-77-07(C)(1) and PTI #P0118951]

- (2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the cyclone associated with this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the

observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0118951]

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0118951: d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. when dust control system serving as PE control for this emissions unit was not in service while this emissions unit was operating;
 - ii. all weeks during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

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

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0118951: e)(1) and e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitation:

Particulate emissions shall not exceed 7.4 lbs. per hour

The above hourly limitation is based on the following equation:

$$E = 4.10 (P)^{0.67}$$

Where:

(E) = Allowable Rate of Particulate Emissions, in pounds per hour; and

(P) = Process Weight Rate at Maximum Capacity, in tons per hour, ((4800 lbs./hr./2000 = 2.4 tons per hour)).

Applicable Compliance Method:

Compliance based on the maximum production rate is 4800 pounds per hour.

If required, compliance with the stack particulate emissions limitation shall be determined through a stack test performed in accordance with 40 CFR Part 60, Appendix A Methods 1-5.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0118951]

b. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.



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Applicable Compliance Method:

If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0118951]

g) Miscellaneous Requirements

(1) None.



4. P004, Paint Stripping Area in Bldg. #103

Operations, Property and/or Equipment Description:

Paint Stripping Operation

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)c., d)(3), d)(4), and d)(5).

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) (05-14423 issued 02/02/2008)	<p>The OC content of the paint stripping materials employed in this emissions unit shall not exceed 10.0 lbs/gallon, as applied.</p> <p>The OC content of liquid organic cleanup materials employed in this emissions unit shall not exceed 6.57 lbs/gallon, as applied.</p> <p>The requirements of this rule also include compliance with the requirements in and 3745-31-05(D).</p>
b.	OAC rule 3745-31-05(D) Synthetic minor to avoid PSD	Total combined OC from the stripping and cleanup operations shall not exceed 6.23 tons per rolling, 12-month period for emissions unit P004.
c.	OAC rule 3745-114-01	<p>Ohio Toxic Rule</p> <p>See d)(3), d)(4) and d)(5), below.</p>

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

- (1) The maximum annual cleaning solvent usage shall not exceed 1,000 gallons per rolling, 12-month period for emissions unit P004.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3)]

- (2) The maximum annual brushable stripper usage shall not exceed 400 gallons per rolling, 12-month period for emissions unit P004.

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-31-05(A)(3)]

- (3) The maximum annual aircraft paint remover usage shall not exceed 200 gallons per rolling, 12-month period for emissions unit P004.

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-31-05(A)(3)]

d) Monitoring and/or Recordkeeping Requirements

- (1) This facility shall maintain the following monthly records on all strippers employed in emissions unit P004:

- a. the name of the coating employed;
- b. the amount of coating employed, in gallons;
- c. the organic compound content, in lbs/gallon;
- d. the OC emission of all coatings employed, in tons per month; and
- e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

- (2) The permittee shall collect and record the following information each month on the cleanup materials in emissions unit P004:

- a. the name of the material employed;
- b. the amount of material employed, in gallons;
- c. the organic compound content, in lbs/gallon;
- d. the OC emission of all cleanup materials, in tons per month; and
- e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

- (3) The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Methylene Chloride

TLV (ppm): 50

Maximum Hourly Emission Rate (g/s): 0.323

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 140.3

MAGLC (ug/m3): 4135.2

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-114-01]

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(PPP)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined

as a modification under other provisions of the modification definition (other than (PPP)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-114-01]

- (5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-114-01]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify the following:
- a. all exceedances of the rolling, 12-month period cleaning solvent usage limitation of 1,000 gallons;
 - b. all exceedances of liquid cleanup OC content of 6.57 lbs/gal;
 - c. all exceedances of the rolling, 12-month period brushable stripper usage limitation of 400 gallons;
 - d. all exceedances of the rolling, 12-month period aircraft paint remover usage limitation of 200 gallons;
 - e. all exceedances of paint stripper OC content of 10 lbs/gal; and/or
 - f. all exceedances of the rolling, 12-month period OC emission limitation of 6.23 tons for emissions unit P004.

These quarterly deviation reports are due by the dates specified in the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and 3745-31-05(D)]

- (2) The permittee shall notify the Director, in writing, of any monthly record showing the use of noncompliant materials, i.e., photo chemically reactive materials. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District



Office, Division of Air Pollution Control within 30 days following the end of the calendar month during which the noncompliance occurred.

[Authority for term: OAC rule 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

- a. Emission Limitation:

- 6.23 tons of OC per rolling, 12-month period for emissions unit P004.

- Applicable Compliance Method:

- Compliance shall be based on the record keeping as established in section d) of this permit.

- [Authority for term: OAC rule 3745-77-07(C)(1) and 3745-31-05(D)]

- b. Emission Limitation:

- The OC content of the paint stripping materials employed in this emissions unit shall not exceed 10.0 lbs/gallon, as applied.

- The OC content of liquid organic cleanup materials employed in this emissions unit shall not exceed 6.57 lbs/gallon, as applied.

- Applicable Compliance Method:

- Formulation data or Method 24 of 40 CFR, Part 60, Appendix A, shall be used to demonstrate compliance with the organic compound content limitations.

- [Authority for term: OAC rule 3745-77-07(C)(1) and 3745-31-05(A)(3)]

g) Miscellaneous Requirements

- (1) None.



5. P005, Aluminum CNC Router

Operations, Property and/or Equipment Description:

Aluminum CNC router and associated high efficiency cyclone

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(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) June 30, 2008 (P0118951 issued on 6/3/2015)	Install a Fabric Filter Baghouse with a design control efficiency of at least 95% control, by weight, for particulate emissions (PE) emissions of particulate matter 10 microns and less in diameter (PM10), and emissions of particulate matter 2.5 microns and less in diameter (PM2.5). See b)(2)a., below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A) do not apply to the PE, PM10, and PM2.5 emissions from this air contaminant source since the potential to emit is less than 10 tons per year. See b)(2)b., below.
c.	OAC rule 3745-17-11(B)(2)	1.4 lbs. of particulate emissions (PE)/ hour.
d.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit 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).

- b. These requirements apply 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 dust control system whenever this emissions unit is in operation.

[Authority for term: OAC rules 3745-77-07(A)(1) and PTI #P0118951]

- (2) In order to ensure the source continues to operate as designed; the permittee shall operate this emissions unit in accordance with manufacturer's recommendations and shall follow the manufacturer's recommended maintenance, at the recommended intervals. The permittee shall keep a record of the maintenance on this emissions unit along with manufacturer's recommendations.

[Authority for term: OAC rules 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records that document any time periods when the dust control system serving as PE control for this emissions unit was not in service while this emissions unit was operating.

[Authority for term: OAC rules 3745-77-07(C)(1) and PTI #P0118951]

- (2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the cyclone associated with this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the

observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0118951]

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0118951: d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. when dust control system serving as PE control for this emissions unit was not in service while this emissions unit was operating;
 - ii. all weeks during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

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

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0118951: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

- a. Emission Limitation:

1.4 pounds per hour.

Applicable Compliance Method:

The above limitation is based on the following equation:

$$(E) = 4.10 \times (P)^{0.67}$$

Where:

(E) = Allowable Rate of Particulate Emissions, in pounds per hour; and

(P) = Process Weight Rate at Maximum Capacity, in tons per hour, ((400 lbs./hr. / 2000 = 0.2 ton per hour)).

If required, compliance with the stack particulate emissions limitation shall be determined through a stack test performed in accordance with 40 CFR Part 60, Appendix A Methods 1-5.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0118951]

Emission Limitation

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.



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Applicable Compliance Method:

If requested, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0118951]

g) Miscellaneous Requirements

(1) None.

6. P006, Aluminum CNC Router - 2015

Operations, Property and/or Equipment Description:

Aluminum CNC router and associated high efficiency cyclone

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(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) June 30, 2008 (P0118951 issued on 6/3/2015)	Install a Fabric Filter Baghouse with a design control efficiency of at least 95% control, by weight, for particulate emissions (PE) emissions of particulate matter 10 microns and less in diameter (PM10), and emissions of particulate matter 2.5 microns and less in diameter (PM2.5). See b)(2)a., below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A) do not apply to the PE, PM10, and PM2.5 emissions from this air contaminant source since the potential to emit is less than 10 tons per year. See b)(2)b., below.
c.	OAC rule 3745-17-11(B)(2)	1.53 lbs. of particulate emissions (PE)/hour.
d.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit 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).

- b. These requirements apply 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 dust control system whenever this emissions unit is in operation.

[Authority for term: OAC rules 3745-77-07(A)(1) and PTI #P0118951]

- (2) In order to ensure the source continues to operate as designed; the permittee shall operate this emissions unit in accordance with manufacturer's recommendations and shall follow the manufacturer's recommended maintenance, at the recommended intervals. The permittee shall keep a record of the maintenance on this emissions unit along with manufacturer's recommendations.

[Authority for term: OAC rules 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the cyclone associated with this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal

operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0118951]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0118951: d)(1). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. when dust control system serving as PE control for this emissions unit was not in service while this emissions unit was operating; and
 - ii. all weeks during which any visible particulate emissions were observed from the stack serving this emissions unit; and
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

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

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0118951: e)(1) and e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

- a. Emission Limitation:

1.53 pounds per hour

Applicable Compliance Method:

The above limitation is based on the following equation:

$$(E) = 4.10 \times (P)^{0.67}$$

Where:

(E) = Allowable Rate of Particulate Emissions, in pounds per hour; and

(P) = Process Weight Rate at Maximum Capacity, in tons per hour, ((450 lbs./hr / 2000 = 0.23 ton per hour)).

If required, compliance with the stack particulate emissions limitation shall be determined through a stack test performed in accordance with 40 CFR Part 60, Appendix A Methods 1-5.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0118951]

- b. Emission Limitation

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.



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Applicable Compliance Method:

If requested, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0118951]

g) Miscellaneous Requirements

(1) None.



7. P007, Plasma Cutter

Operations, Property and/or Equipment Description:

Plasma Cutter

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(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) June 30, 2008 (P0118951 issued on 6/3/2015)	Install a Fabric Filter Baghouse with a design control efficiency of at least 95% control, by weight, for particulate emissions (PE) emissions of particulate matter 10 microns and less in diameter (PM10), and emissions of particulate matter 2.5 microns and less in diameter (PM2.5). See b)(2)a., below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A) do not apply to the PE, PM10, and PM2.5 emissions from this air contaminant source since the potential to emit is less than 10 tons per year. See b)(2)b., below.
c.	OAC rule 3745-17-11(B)(2)	0.551 lb. of particulate emissions (PE)/hour.
d.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit 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).

- b. These requirements apply 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

[Authority for term: OAC rules 3745-77-07(A)(1) and PTI #P0118951]

- (1) In order to ensure the source continues to operate as designed; the permittee shall operate this emissions unit in accordance with manufacturer's recommendations and shall follow the manufacturer's recommended maintenance, at the recommended intervals. The permittee shall keep a record of the maintenance on this emissions unit along with manufacturer's recommendations.

[Authority for term: OAC rules 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the cyclone associated with this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0118951]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0118951: d)(1). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. when dust control system serving as PE control for this emissions unit was not in service while this emissions unit was operating; and
 - ii. all weeks during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0118951: e)(1) and e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

- a. Emission Limitation:

0.551 pound per hour

Applicable Compliance Method:

The above limitation is based on the following equation:

$$(E) = 0.551 \text{ pound per hour}$$

Where:

(E) = Allowable Rate of Particulate Emissions, in pounds per hour; and

(P) = Process Weight Rate at Maximum Capacity, in tons per hour, ((100 lbs./hr./2000 = 0.05 ton per hour)).

If required, compliance with the stack particulate emissions limitation shall be determined through a stack test performed in accordance with 40 CFR Part 60, Appendix A Methods 1-5.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0118951]

- b. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If requested, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0118951]

g) Miscellaneous Requirements

- (1) None.

8. R001, Glue & Staining Spray Booth - Building 102

Operations, Property and/or Equipment Description:

Glue Spray Booth - Spray-on Contact Adhesive - Building 102

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

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(B)	Particulate emissions (PE) shall not exceed 0.551 lb./hr. See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(C)	Use of an overspray control system. See c)(1), c)(2), d)(1) thru (5), and e)(1).

(2) Additional Terms and Conditions

a. The particulate matter emission limit is derived based on the equation noted with Table 1 from OAC Rule 3745-11. Figure II does not apply (per OAC rule 3745-17-11(A)(2)(a)(i)) because the uncontrolled mass rate of particulate emissions cannot be determined.

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.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-17-11(C)(1) and (2)(b)]

(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.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-17-11(C)(2)(e)]

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 appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-11(C)(2)(a)]

- (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 and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-11(C)(2)(c)]

- (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.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-11(C)(2)(c)]

- (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 person who performed the inspection.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-11(C)(2)(d) and (f)]

- (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.

[Authority for term: OAC rules 3745-77-07(C)(1),3745-17-11(C)(2)(e), (f), and (g)]

e) Reporting Requirements

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

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation; and
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

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

[Authority for term: OAC rules 3745-77-07(C)(1),3745-15-03(B)(1)(a), 3745-15-03(C)]

(2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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



a. Emission Limitation:

0.551 lb. of PE/hr.

Applicable Compliance Method:

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

$$E = \text{MCSUR} \times (1 - \text{TE}) \times (1 - \text{CE})$$

where:

E = PE rate (lbs/hr)

MCSUR = the maximum coating solids usage rate (lbs/hr)

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.

CE = control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.