

Facility ID: 1677010999 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

- [Go to Part II for Emissions Unit B001](#)
- [Go to Part II for Emissions Unit B002](#)
- [Go to Part II for Emissions Unit B003](#)
- [Go to Part II for Emissions Unit B004](#)
- [Go to Part II for Emissions Unit K001](#)
- [Go to Part II for Emissions Unit K002](#)
- [Go to Part II for Emissions Unit K003](#)
- [Go to Part II for Emissions Unit K006](#)
- [Go to Part II for Emissions Unit K007](#)
- [Go to Part II for Emissions Unit K008](#)
- [Go to Part II for Emissions Unit K009](#)
- [Go to Part II for Emissions Unit K010](#)
- [Go to Part II for Emissions Unit R001](#)
- [Go to Part II for Emissions Unit R002](#)

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Facility ID: 1677010999 Emissions Unit ID: B001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
50 mmBtu/hr natural gas and No. 2 fuel oil fired boiler	OAC rule 3745-35-07	See A.2.a below.
When burning natural gas:	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-10	0.020 pound of particulates per million Btu of actual heat input
When burning No. 2 fuel oil:	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-10	0.020 pound of particulates per million Btu of actual heat input
	40 CFR 52.1881(b)(59)(xix)	1.10 pounds of sulfur dioxide per million Btu of actual heat input.
	OAC rule 3745-18-83(J)	See A.2.b below.

2. **Additional Terms and Conditions**
  - (a) The combined NOx emissions and SO2 emissions from all four 50 mmBtu boilers (B001-B004) at this facility shall not exceed 50.8 tons and 1.1 tons per year, respectively, based upon rolling, 12-month summations. The sulfur dioxide emission limitation in this rule is less stringent than the sulfur dioxide emission limitation in 40 CFR 52.1881(b)(59)(xix).

**B. Operational Restrictions**

1. The permittee has agreed to accept limitations on natural gas and fuel oil consumption to keep the facility NOx emissions and SO2 emissions below 100 tons per year. The emission limitations and fuel consumption restrictions are for the following emissions units at this facility: B001, B002, B003, and B004 combined.
  - a. The annual natural gas usage for B001-B004 shall be limited to 720 million cubic feet per year, based upon rolling, 12-month summations.
  - b. The annual No. 2 fuel oil usage in B001-B004 shall be limited to 40,000 gallons per year, based upon rolling, 12-month summations.Compliance with the natural gas and No. 2 fuel oil usage restrictions shall be determined by using the record keeping requirements specified in Section C.4.
2. The quality of the oil burned in this emissions unit shall meet the following specifications on an as-received basis:
  - a. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.10 pounds of sulfur dioxide per million Btu of actual heat input; and
  - b. a heat content greater than 135,000 Btu per gallon of oil.Compliance with the above-mentioned specifications shall be determined by using the weighted average of the analytical results provided by the permittee or oil supplier for all shipments of oil during each calendar month.
3. The permittee shall burn only natural gas and No. 2 fuel oil as fuel in this emissions unit.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain as a record, on a monthly basis, copies of the oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) of each shipment of oil. The following information shall also be included with the copies of the oil supplier's analyses:
  - a. the total quantity of oil received in each shipment (gallons);
  - b. the weighted\* average sulfur dioxide emission rate (pounds of SO2 per million Btu) for the oil received during each calendar month; and
  - c. the weighted\* average heat content (Btu/gallon) of the oil received during each calendar month.\*In proportion to the quantity of oil received in each shipment during the calendar month.
2. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.
3. For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
4. The permittee shall maintain monthly records which list the following information:
  - a. the total amount of natural gas and No. 2 fuel oil burned in this emissions unit;
  - b. the total amount of natural gas and No. 2 fuel oil burned in B001-B004;
  - c. the total NOx emissions and SO2 emissions from B001-B004;
  - d. the rolling, 12-month summations of NOx emissions and SO2 emissions from B001-B004; and
  - e. the rolling, 12-month summations of natural gas and No. 2 fuel oil burned in B001-B004.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify any monthly record that documents an exceedance of the SO2 emission limit of 1.10 pounds of sulfur dioxide per million Btu, along with the cause of the exceedance and an explanation of any corrective actions taken to prevent future exceedances.
2. The permittee shall submit deviation (excursion) reports which identify any monthly record that documents a weighted average heat content that is less than or equal to 135,000 Btu per gallon of oil.
3. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
4. The permittee shall submit deviation (excursion) reports which identify any monthly record that documents an exceedance of the natural gas usage restriction of 720 million cubic feet per year, based upon a rolling, 12-month summation and the No. 2 fuel oil usage restriction of 40,000 gallons per year, based upon a rolling, 12-month summation. The deviation reports shall include the cause of each exceedance and an explanation of any corrective actions taken to prevent future exceedances.
5. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.
6. The permittee shall submit annual reports which identify the following information for the calendar year:
  - a. the amount of natural gas and No. 2 fuel oil burned in B001-B004;
  - b. total NOx emissions from B001-B004, in tons;
  - c. total facility-wide NOx emissions, in tons;

- d. total SO<sub>2</sub> emissions from B001-B004, in tons; and  
 e. total facility-wide SO<sub>2</sub> emissions, in tons.

These reports shall be submitted by February 15 of each year and shall include the data for the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

0.020 pound of particulate matter per million Btu of actual heat input

Applicable Compliance Method:

To demonstrate compliance with OAC rule 3745-17-10 when burning distillate fuel oil, the permittee shall multiply the particulate emission factor of 0.002 pound of particulate emissions per gallon burned by the maximum hourly distillate fuel oil consumption rate of 370 gallons per hour, and divide by 50 mmBtu per hour.

To demonstrate compliance with OAC rule 3745-17-10 when burning natural gas, the permittee shall multiply the particulate emission factor of 13.5 pounds of particulate emissions per million cubic feet burned by the maximum hourly natural gas consumption rate (0.05 million cubic feet per hour), and divide by 50 mmBtu per hour.

Emission Limitation:

1.10 pounds of sulfur dioxide per million Btu of actual heat input

Applicable Compliance Method:

When burning distillate fuel oil, compliance shall be based upon the volume and analytical results of each shipment of oil, the use of the equation contained in OAC rule 3745-18-04(F)(2) to calculate the actual sulfur dioxide emission rate for each calendar month, and the record keeping required in Section C above.

Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

1. Emission Limitation:

50.8 TPY of combined NO<sub>x</sub> emissions from B001-B004

Applicable Compliance Method:

The NO<sub>x</sub> emissions for each calendar month shall be calculated in accordance with the following equation:

$$[(0.00014X)+(0.02Y)] / 2000 = \text{NO}_x$$

Where:

X = amount of natural gas combusted during the month in B001-B004, in cubic feet;

Y = amount of No. 2 fuel oil combusted during the month in B001-B004, in gallons; and

NO<sub>x</sub> = nitrogen oxides emissions, in tons.

The emission factors in the equation above were obtained from AP-42, Chapter 1, dated 10/96.

The calculated NO<sub>x</sub> emission rate for each month shall be added to the calculated emissions from the prior 11 months to determine the rolling, 12-month summation.

Emission Limitation:

1.1 TPY of combined SO<sub>2</sub> emissions from B001-B004

Applicable Compliance Method:

The SO<sub>2</sub> emissions for a rolling, 12-month period shall be calculated in accordance with the following equation:

$$[(0.142S) \times Y] / 2000 = \text{SO}_2$$

Where:

S = the weighted average sulfur content, in percent by weight, for all shipments of oil received during the 12-month period;

Y = the total amount of No. 2 fuel oil burned during the 12-month period in B001-B004, in gallons; and

SO<sub>2</sub> = sulfur dioxide emissions, in tons.

The emission factor in the equation above was obtained from AP-42, Chapter 1, dated 10/96.

**F. Miscellaneous Requirements**

1. Sections A, B, C, D, E, and F of these terms and conditions constitute the federally enforceable portion of this permit.

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Facility ID: 1677010999 Emissions Unit ID: B002 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
50 mmBtu/hr natural gas and No. 2 fuel oil fired boiler	OAC rule 3745-35-07	See A.2.a below.
When burning natural gas:	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-10	0.020 pound of particulates per million Btu of actual heat input
When burning No. 2 fuel oil:	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-10	0.020 pound of particulates per million Btu of actual heat input
	40 CFR 52.1881(b)(59)(xix)	1.10 pounds of sulfur dioxide per million Btu of actual heat input.
	OAC rule 3745-18-83(J)	See A.2.b below.

**2. Additional Terms and Conditions**

- (a) The combined NOx emissions and SO2 emissions from all four 50 mmBtu boilers (B001-B004) at this facility shall not exceed 50.8 tons and 1.1 tons per year, respectively, based upon rolling, 12-month summations.  
The sulfur dioxide emission limitation in this rule is less stringent than the sulfur dioxide emission limitation in 40 CFR 52.1881(b)(59)(xix).

**B. Operational Restrictions**

1. The permittee has agreed to accept limitations on natural gas and fuel oil consumption to keep the facility NOx emissions and SO2 emissions below 100 tons per year. The emission limitations and fuel consumption restrictions are for the following emissions units at this facility: B001, B002, B003, and B004 combined.
  - a. The annual natural gas usage for B001-B004 shall be limited to 720 million cubic feet per year, based upon rolling, 12-month summations.
  - b. The annual No. 2 fuel oil usage in B001-B004 shall be limited to 40,000 gallons per year, based upon rolling, 12-month summations.

Compliance with the natural gas and No. 2 fuel oil usage restrictions shall be determined by using the record keeping requirements specified in Section C.4.
2. The quality of the oil burned in this emissions unit shall meet the following specifications on an as-received basis:

- a. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.10 pounds of sulfur dioxide per million Btu of actual heat input; and
  - b. a heat content greater than 135,000 Btu per gallon of oil.

Compliance with the above-mentioned specifications shall be determined by using the weighted average of the analytical results provided by the permittee or oil supplier for all shipments of oil during each calendar month.

- 3. The permittee shall burn only natural gas and No. 2 fuel oil as fuel in this emissions unit.

**C. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall maintain as a record, on a monthly basis, copies of the oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) of each shipment of oil. The following information shall also be included with the copies of the oil supplier's analyses:
  - a. the total quantity of oil received in each shipment (gallons);
  - b. the weighted\* average sulfur dioxide emission rate (pounds of SO<sub>2</sub> per million Btu) for the oil received during each calendar month; and
  - c. the weighted\* average heat content (Btu/gallon) of the oil received during each calendar month.

\*In proportion to the quantity of oil received in each shipment during the calendar month.
- 2. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.
- 3. For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- 4. The permittee shall maintain monthly records which list the following information:
  - a. the total amount of natural gas and No. 2 fuel oil burned in this emissions unit;
  - b. the total amount of natural gas and No. 2 fuel oil burned in B001-B004;
  - c. the total NO<sub>x</sub> emissions and SO<sub>2</sub> emissions from B001-B004;
  - d. the rolling, 12-month summations of NO<sub>x</sub> emissions and SO<sub>2</sub> emissions from B001-B004; and
  - e. the rolling, 12-month summations of natural gas and No. 2 fuel oil burned in B001-B004.

**D. Reporting Requirements**

- 1. The permittee shall submit deviation (excursion) reports which identify any monthly record that documents an exceedance of the SO<sub>2</sub> emission limit of 1.10 pounds of sulfur dioxide per million Btu, along with the cause of the exceedance and an explanation of any corrective actions taken to prevent future exceedances.
- 2. The permittee shall submit deviation (excursion) reports which identify any monthly record that documents a weighted average heat content that is less than or equal to 135,000 Btu per gallon of oil.
- 3. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- 4. The permittee shall submit deviation (excursion) reports which identify any monthly record that documents an exceedance of the natural gas usage restriction of 720 million cubic feet per year, based upon a rolling, 12-month summation and the No. 2 fuel oil usage restriction of 40,000 gallons per year, based upon a rolling, 12-month summation. The deviation reports shall include the cause of each exceedance and an explanation of any corrective actions taken to prevent future exceedances.
- 5. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.
- 6. The permittee shall submit annual reports which identify the following information for the calendar year:
  - a. the amount of natural gas and No. 2 fuel oil burned in B001-B004;
  - b. total NO<sub>x</sub> emissions from B001-B004, in tons;
  - c. total facility-wide NO<sub>x</sub> emissions, in tons;
  - d. total SO<sub>2</sub> emissions from B001-B004, in tons; and
  - e. total facility-wide SO<sub>2</sub> emissions, in tons.

These reports shall be submitted by February 15 of each year and shall include the data for the previous calendar year.

**E. Testing Requirements**

- 1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
 

Emission Limitation:

0.020 pound of particulate matter per million Btu of actual heat input

Applicable Compliance Method:

To demonstrate compliance with OAC rule 3745-17-10 when burning distillate fuel oil, the permittee shall multiply the particulate emission factor of 0.002 pound of particulate emissions per gallon burned by the

maximum hourly distillate fuel oil consumption rate of 370 gallons per hour, and divide by 50 mmBtu per hour.

To demonstrate compliance with OAC rule 3745-17-10 when burning natural gas, the permittee shall multiply the particulate emission factor of 13.5 pounds of particulate emissions per million cubic feet burned by the maximum hourly natural gas consumption rate (0.05 million cubic feet per hour), and divide by 50 mmBtu per hour.

Emission Limitation:

1.10 pounds of sulfur dioxide per million Btu of actual heat input

Applicable Compliance Method:

When burning distillate fuel oil, compliance shall be based upon the volume and analytical results of each shipment of oil, the use of the equation contained in OAC rule 3745-18-04(F)(2) to calculate the actual sulfur dioxide emission rate for each calendar month, and the record keeping required in Section C above.

Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

1. Emission Limitation:

50.8 TPY of combined NOx emissions from B001-B004

Applicable Compliance Method:

The NOx emissions for each calendar month shall be calculated in accordance with the following equation:

$$[(0.00014X)+(0.02Y)] / 2000 = \text{NOx}$$

Where:

X = amount of natural gas combusted during the month in B001-B004, in cubic feet;

Y = amount of No. 2 fuel oil combusted during the month in B001-B004, in gallons; and

NOx = nitrogen oxides emissions, in tons.

The emission factors in the equation above were obtained from AP-42, Chapter 1, dated 10/96.

The calculated NOx emission rate for each month shall be added to the calculated emissions from the prior 11 months to determine the rolling, 12-month summation.

Emission Limitation:

1.1 TPY of combined SO2 emissions from B001-B004

Applicable Compliance Method:

The SO2 emissions for a rolling, 12-month period shall be calculated in accordance with the following equation:

$$[(0.142S) \times Y] / 2000 = \text{SO2}$$

Where:

S = the weighted average sulfur content, in percent by weight, for all shipments of oil received during the 12-month period;

Y = the total amount of No. 2 fuel oil burned during the 12-month period in B001-B004, in gallons; and

SO2 = sulfur dioxide emissions, in tons.

The emission factor in the equation above was obtained from AP-42, Chapter 1, dated 10/96.

**F. Miscellaneous Requirements**

1. Sections A, B, C, D, E, and F of these terms and conditions constitute the federally enforceable portion of this permit.

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Facility ID: 1677010999 Emissions Unit ID: B003 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
50 mmBtu/hr natural gas and No. 2 fuel oil fired boiler	OAC rule 3745-35-07	See A.2.a below.
When burning natural gas:	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-10	0.020 pound of particulates per million Btu of actual heat input
When burning No. 2 fuel oil:	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-10	0.020 pound of particulates per million Btu of actual heat input
	40 CFR 52.1881(b)(59)(xix)	1.10 pounds of sulfur dioxide per million Btu of actual heat input.
	OAC rule 3745-18-83(J)	See A.2.b below.

**2. Additional Terms and Conditions**

- (a) The combined NOx emissions and SO2 emissions from all four 50 mmBtu boilers (B001-B004) at this facility shall not exceed 50.8 tons and 1.1 tons per year, respectively, based upon rolling, 12-month summations.  
The sulfur dioxide emission limitation in this rule is less stringent than the sulfur dioxide emission limitation in 40 CFR 52.1881(b)(59)(xix).

**B. Operational Restrictions**

1. The permittee has agreed to accept limitations on natural gas and fuel oil consumption to keep the facility NOx emissions and SO2 emissions below 100 tons per year. The emission limitations and fuel consumption restrictions are for the following emissions units at this facility: B001, B002, B003, and B004 combined.
  - a. The annual natural gas usage for B001-B004 shall be limited to 720 million cubic feet per year, based upon rolling, 12-month summations.
  - b. The annual No. 2 fuel oil usage in B001-B004 shall be limited to 40,000 gallons per year, based upon rolling, 12-month summations.

Compliance with the natural gas and No. 2 fuel oil usage restrictions shall be determined by using the record keeping requirements specified in Section C.4.
2. The quality of the oil burned in this emissions unit shall meet the following specifications on an as-received basis:
  - a. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.10 pounds of sulfur dioxide per million Btu of actual heat input; and
  - b. a heat content greater than 135,000 Btu per gallon of oil.

Compliance with the above-mentioned specifications shall be determined by using the weighted average of the analytical results provided by the permittee or oil supplier for all shipments of oil during each calendar month.
3. The permittee shall burn only natural gas and No. 2 fuel oil as fuel in this emissions unit.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain as a record, on a monthly basis, copies of the oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) of each shipment of oil. The following information shall also be included with the copies of the oil supplier's analyses:
  - a. the total quantity of oil received in each shipment (gallons);

- b. the weighted\* average sulfur dioxide emission rate (pounds of SO<sub>2</sub> per million Btu) for the oil received during each calendar month; and
- c. the weighted\* average heat content (Btu/gallon) of the oil received during each calendar month.

\*In proportion to the quantity of oil received in each shipment during the calendar month.

- 2. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.
- 3. For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- 4. The permittee shall maintain monthly records which list the following information:
  - a. the total amount of natural gas and No. 2 fuel oil burned in this emissions unit;
  - b. the total amount of natural gas and No. 2 fuel oil burned in B001-B004;
  - c. the total NO<sub>x</sub> emissions and SO<sub>2</sub> emissions from B001-B004;
  - d. the rolling, 12-month summations of NO<sub>x</sub> emissions and SO<sub>2</sub> emissions from B001-B004; and
  - e. the rolling, 12-month summations of natural gas and No. 2 fuel oil burned in B001-B004.

**D. Reporting Requirements**

- 1. The permittee shall submit deviation (excursion) reports which identify any monthly record that documents an exceedance of the SO<sub>2</sub> emission limit of 1.10 pounds of sulfur dioxide per million Btu, along with the cause of the exceedance and an explanation of any corrective actions taken to prevent future exceedances.
- 2. The permittee shall submit deviation (excursion) reports which identify any monthly record that documents a weighted average heat content that is less than or equal to 135,000 Btu per gallon of oil.
- 3. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- 4. The permittee shall submit deviation (excursion) reports which identify any monthly record that documents an exceedance of the natural gas usage restriction of 720 million cubic feet per year, based upon a rolling, 12-month summation and the No. 2 fuel oil usage restriction of 40,000 gallons per year, based upon a rolling, 12-month summation. The deviation reports shall include the cause of each exceedance and an explanation of any corrective actions taken to prevent future exceedances.
- 5. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.
- 6. The permittee shall submit annual reports which identify the following information for the calendar year:
  - a. the amount of natural gas and No. 2 fuel oil burned in B001-B004;
  - b. total NO<sub>x</sub> emissions from B001-B004, in tons;
  - c. total facility-wide NO<sub>x</sub> emissions, in tons;
  - d. total SO<sub>2</sub> emissions from B001-B004, in tons; and
  - e. total facility-wide SO<sub>2</sub> emissions, in tons.

These reports shall be submitted by February 15 of each year and shall include the data for the previous calendar year.

**E. Testing Requirements**

- 1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
  
0.020 pound of particulate matter per million Btu of actual heat input  
  
Applicable Compliance Method:  
  
To demonstrate compliance with OAC rule 3745-17-10 when burning distillate fuel oil, the permittee shall multiply the particulate emission factor of 0.002 pound of particulate emissions per gallon burned by the maximum hourly distillate fuel oil consumption rate of 370 gallons per hour, and divide by 50 mmBtu per hour.  
  
To demonstrate compliance with OAC rule 3745-17-10 when burning natural gas, the permittee shall multiply the particulate emission factor of 13.5 pounds of particulate emissions per million cubic feet burned by the maximum hourly natural gas consumption rate (0.05 million cubic feet per hour), and divide by 50 mmBtu per hour.  
Emission Limitation:  
  
1.10 pounds of sulfur dioxide per million Btu of actual heat input  
  
Applicable Compliance Method:  
  
When burning distillate fuel oil, compliance shall be based upon the volume and analytical results of each shipment of oil, the use of the equation contained in OAC rule 3745-18-04(F)(2) to calculate the actual sulfur dioxide emission rate for each calendar month, and the record keeping required in Section C above.  
Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

1. Emission Limitation:

50.8 TPY of combined NOx emissions from B001-B004

Applicable Compliance Method:

The NOx emissions for each calendar month shall be calculated in accordance with the following equation:

$$[(0.00014X)+(0.02Y)] / 2000 = \text{NOx}$$

Where:

X = amount of natural gas combusted during the month in B001-B004, in cubic feet;

Y = amount of No. 2 fuel oil combusted during the month in B001-B004, in gallons; and

NOx = nitrogen oxides emissions, in tons.

The emission factors in the equation above were obtained from AP-42, Chapter 1, dated 10/96.

The calculated NOx emission rate for each month shall be added to the calculated emissions from the prior 11 months to determine the rolling, 12-month summation.

Emission Limitation:

1.1 TPY of combined SO2 emissions from B001-B004

Applicable Compliance Method:

The SO2 emissions for a rolling, 12-month period shall be calculated in accordance with the following equation:

$$[(0.142S) \times Y] / 2000 = \text{SO2}$$

Where:

S = the weighted average sulfur content, in percent by weight, for all shipments of oil received during the 12-month period;

Y = the total amount of No. 2 fuel oil burned during the 12-month period in B001-B004, in gallons; and

SO2 = sulfur dioxide emissions, in tons.

The emission factor in the equation above was obtained from AP-42, Chapter 1, dated 10/96.

F. **Miscellaneous Requirements**

1. Sections A, B, C, D, E, and F of these terms and conditions constitute the federally enforceable portion of this permit.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

**Facility ID: 1677010999 Emissions Unit ID: B004 Issuance type: Final State Permit To Operate**

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
50 mmBtu/hr natural gas and No. 2 fuel oil fired boiler	OAC rule 3745-35-07	See A.2.a below.
When burning natural gas:	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-10	0.020 pound of particulates per million Btu of actual heat input
When burning No. 2 fuel oil:	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-10	0.020 pound of particulates per million Btu of actual heat input
	40 CFR 52.1881(b)(59)(xix)	1.10 pounds of sulfur dioxide per million Btu of actual heat input.
	OAC rule 3745-18-83(J)	See A.2.b below.
<b>2. Additional Terms and Conditions</b>		
<p>(a) The combined NOx emissions and SO2 emissions from all four 50 mmBtu boilers (B001-B004) at this facility shall not exceed 50.8 tons and 1.1 tons per year, respectively, based upon rolling, 12-month summations. The sulfur dioxide emission limitation in this rule is less stringent than the sulfur dioxide emission limitation in 40 CFR 52.1881(b)(59)(xix).</p>		
<b>B. Operational Restrictions</b>		
<p>1. The permittee has agreed to accept limitations on natural gas and fuel oil consumption to keep the facility NOx emissions and SO2 emissions below 100 tons per year. The emission limitations and fuel consumption restrictions are for the following emissions units at this facility: B001, B002, B003, and B004 combined.</p> <p>a. The annual natural gas usage for B001-B004 shall be limited to 720 million cubic feet per year, based upon rolling, 12-month summations.</p> <p>b. The annual No. 2 fuel oil usage in B001-B004 shall be limited to 40,000 gallons per year, based upon rolling, 12-month summations.</p> <p>Compliance with the natural gas and No. 2 fuel oil usage restrictions shall be determined by using the record keeping requirements specified in Section C.4.</p>		
<p>2. The quality of the oil burned in this emissions unit shall meet the following specifications on an as-received basis:</p> <p>a. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.10 pounds of sulfur dioxide per million Btu of actual heat input; and</p> <p>b. a heat content greater than 135,000 Btu per gallon of oil.</p> <p>Compliance with the above-mentioned specifications shall be determined by using the weighted average of the analytical results provided by the permittee or oil supplier for all shipments of oil during each calendar month.</p>		
<p>3. The permittee shall burn only natural gas and No. 2 fuel oil as fuel in this emissions unit.</p>		
<b>C. Monitoring and/or Record Keeping Requirements</b>		
<p>1. The permittee shall maintain as a record, on a monthly basis, copies of the oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) of each shipment of oil. The following information shall also be included with the copies of the oil supplier's analyses:</p> <p>a. the total quantity of oil received in each shipment (gallons);</p> <p>b. the weighted* average sulfur dioxide emission rate (pounds of SO2 per million Btu) for the oil received during each calendar month; and</p> <p>c. the weighted* average heat content (Btu/gallon) of the oil received during each calendar month.</p> <p>*In proportion to the quantity of oil received in each shipment during the calendar month.</p>		
<p>2. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.</p>		
<p>3. For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.</p>		

4. The permittee shall maintain monthly records which list the following information:
- the total amount of natural gas and No. 2 fuel oil burned in this emissions unit;
  - the total amount of natural gas and No. 2 fuel oil burned in B001-B004;
  - the total NOx emissions and SO2 emissions from B001-B004;
  - the rolling, 12-month summations of NOx emissions and SO2 emissions from B001-B004; and
  - the rolling, 12-month summations of natural gas and No. 2 fuel oil burned in B001-B004.

**D. Reporting Requirements**

- The permittee shall submit deviation (excursion) reports which identify any monthly record that documents an exceedance of the SO2 emission limit of 1.10 pounds of sulfur dioxide per million Btu, along with the cause of the exceedance and an explanation of any corrective actions taken to prevent future exceedances.
- The permittee shall submit deviation (excursion) reports which identify any monthly record that documents a weighted average heat content that is less than or equal to 135,000 Btu per gallon of oil.
- The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- The permittee shall submit deviation (excursion) reports which identify any monthly record that documents an exceedance of the natural gas usage restriction of 720 million cubic feet per year, based upon a rolling, 12-month summation and the No. 2 fuel oil usage restriction of 40,000 gallons per year, based upon a rolling, 12-month summation. The deviation reports shall include the cause of each exceedance and an explanation of any corrective actions taken to prevent future exceedances.
- The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.
- The permittee shall submit annual reports which identify the following information for the calendar year:
  - the amount of natural gas and No. 2 fuel oil burned in B001-B004;
  - total NOx emissions from B001-B004, in tons;
  - total facility-wide NOx emissions, in tons;
  - total SO2 emissions from B001-B004, in tons; and
  - total facility-wide SO2 emissions, in tons.

These reports shall be submitted by February 15 of each year and shall include the data for the previous calendar year.

**E. Testing Requirements**

- Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
  
0.020 pound of particulate matter per million Btu of actual heat input  
  
Applicable Compliance Method:  
  
To demonstrate compliance with OAC rule 3745-17-10 when burning distillate fuel oil, the permittee shall multiply the particulate emission factor of 0.002 pound of particulate emissions per gallon burned by the maximum hourly distillate fuel oil consumption rate of 370 gallons per hour, and divide by 50 mmBtu per hour.  
  
To demonstrate compliance with OAC rule 3745-17-10 when burning natural gas, the permittee shall multiply the particulate emission factor of 13.5 pounds of particulate emissions per million cubic feet burned by the maximum hourly natural gas consumption rate (0.05 million cubic feet per hour), and divide by 50 mmBtu per hour.  
Emission Limitation:  
  
1.10 pounds of sulfur dioxide per million Btu of actual heat input  
  
Applicable Compliance Method:  
  
When burning distillate fuel oil, compliance shall be based upon the volume and analytical results of each shipment of oil, the use of the equation contained in OAC rule 3745-18-04(F)(2) to calculate the actual sulfur dioxide emission rate for each calendar month, and the record keeping required in Section C above.  
Emission Limitation:  
  
20% opacity as a 6-minute average  
  
Applicable Compliance Method:  
  
OAC rule 3745-17-03(B)(1)
- Emission Limitation:  
  
50.8 TPY of combined NOx emissions from B001-B004  
  
Applicable Compliance Method:  
  
The NOx emissions for each calendar month shall be calculated in accordance with the following equation:  
  
$$[(0.00014X)+(0.02Y)] / 2000 = \text{NOx}$$
  
  
Where:

X = amount of natural gas combusted during the month in B001-B004, in cubic feet;

Y = amount of No. 2 fuel oil combusted during the month in B001-B004, in gallons; and

NOx = nitrogen oxides emissions, in tons.

The emission factors in the equation above were obtained from AP-42, Chapter 1, dated 10/96.

The calculated NOx emission rate for each month shall be added to the calculated emissions from the prior 11 months to determine the rolling, 12-month summation.

Emission Limitation:

1.1 TPY of combined SO2 emissions from B001-B004

Applicable Compliance Method:

The SO2 emissions for a rolling, 12-month period shall be calculated in accordance with the following equation:

$$[(0.142S) \times Y] / 2000 = \text{SO}_2$$

Where:

S = the weighted average sulfur content, in percent by weight, for all shipments of oil received during the 12-month period;

Y = the total amount of No. 2 fuel oil burned during the 12-month period in B001-B004, in gallons; and

SO2 = sulfur dioxide emissions, in tons.

The emission factor in the equation above was obtained from AP-42, Chapter 1, dated 10/96.

**F. Miscellaneous Requirements**

1. Sections A, B, C, D, E, and F of these terms and conditions constitute the federally enforceable portion of this permit.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1677010999 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Misc. metal parts paint spray booth with disposable paper filters to control fugitive particulate matter emissions	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11	0.551 lb/hr of particulate matter
	OAC rule 3745-21-09(U)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b below.
	OAC rule 3745-31-05 (PTI 16-195)	See A.2.c below.

**2. Additional Terms and Conditions**

- (a) Although the requirements of OAC rule 3745-21-09(U) allow for an exemption from applicable VOC

content limitations, the daily usage exemption allowed in accordance with OAC rule 3745-21-09(U)(2)(e)(ii) is not part of the federally-approved SIP (for the Cleveland/Akron ozone area). The rule is currently being revised to reflect an exemption level (3 gallons per day) that will be acceptable to USEPA. The Ohio EPA has received confirmation of this in writing; therefore, the 3.0 gallons per day usage restriction in Section B.1 below will apply as the exemption level while OAC rule 3745-21-09(U) is being revised and SIP approval by USEPA is being promulgated.

The total annual hazardous air pollutant (HAP) emissions from this facility shall not exceed 20.2 tons per year, and the individual HAP emissions rate shall not exceed 9.9 tons per year. To ensure these limits are met, Aircraft Braking System Corporation is committing to meet the operational restrictions listed in Section B of this permit.

The best available technology (BAT) determination for PT1 16-195 was determined to be compliance with a daily usage restriction that is less stringent than the daily usage limit established in Section B.1 of this permit.

**B. Operational Restrictions**

1. The permittee shall employ no more than 3.0 gallons of coating in any one day in this emissions unit.
2. The permittee shall operate the disposable paper filtration system when this emissions unit is in operation.
3. The maximum annual coating usage for this facility shall not exceed 5,980 gallons, based on a rolling, 365-day summation of coating usage.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s) Maximum Allowable Cumulative Facility-wide Coating Usage (gallons)

1 500  
 1-2 1000  
 1-3 1500  
 1-4 2000  
 1-5 2500  
 1-6 3000  
 1-7 3500  
 1-8 4000  
 1-9 4500  
 1-10 5000  
 1-11 5500  
 1-12 5980

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 365-day summation of the coating usage.

4. Each coating employed in this emissions unit shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.
5. Cleanup solvents used shall contain no hazardous air pollutants.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each day for the coating line:
  - a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed;
  - c. the total volume, in gallons, of all of the coatings employed; and
  - d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 365-day summation of the coating usage.
2. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the facility-wide cumulative coating usage for each calendar month.
3. Beginning after the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, 365-day summation of the coating usage on a facility-wide basis.
4. The permittee shall maintain a record of whether or not the disposable paper filtration system was in service when the emissions unit was in operation.
5. The permittee shall maintain monthly records of the following information:
  - a. the name and identification number of each coating employed, during the month;
  - b. the total HAP content of each coating, as employed, in pounds per gallon of coating;
  - c. the name and content of each individual HAP of each coating, as employed, in pounds per gallon;
  - d. the name and identification of each cleanup solvent employed; and
  - e. the total HAP content of each cleanup solvent employed, in pounds per gallon.

**D. Reporting Requirements**

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

2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the disposable paper filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 45 days after the event occurs.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day facility-wide coating usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide coating usage levels.
4. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.
5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the coating line employed any coating with an individual HAP content or total HAP content greater than the applicable maximum HAP contents specified in Section B.4 of this permit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
6. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the coating line employed a cleanup solvent that contains any of the 188 hazardous air pollutants. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The permittee shall submit annual reports which specify the total coating usage, the individual HAP emissions, and the total HAP emissions for this emissions unit and the individual HAP emissions and the total HAP emissions for the entire facility for the previous calendar year. These reports shall include the emission calculations and shall be submitted by February 15 of each year.

**E. Testing Requirements**

1. Compliance with the emission limitations and the operational restriction in Sections A.1, A.2, and B. of these terms and conditions shall be determined in accordance with the following methods:
 

Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

Emission Limitation:

0.551 lb/hr of particulate matter

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

E = particulate emissions 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 = fractional control efficiency of the control equipment

If required, emission testing shall be performed in accordance with the procedures in 40 CFR Part 60, Appendix A, Method 5.

Operational Restriction:

use of no more than 3 gallons of coatings per day

Applicable Compliance Method:

Daily records shall be maintained of the daily usage of all coatings employed.

Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 5,980 gallons, based on a rolling, 365-day summation of coating usage.

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all coatings employed in the individual coating lines. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

Operational Restriction:

Coatings employed shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.

Applicable Compliance Method:

Formulation data shall be used to determine the hazardous air pollutant content of each coating employed.

Operational Restriction:

Cleanup solvents used shall contain no hazardous air pollutants.

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all cleanup solvents employed in the individual coating lines. Formulation data shall be used to determine the hazardous air pollutant content of each solvent employed.

F. **Miscellaneous Requirements**

1. Sections A, B, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1677010999 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Misc. metal parts paint spray booth with disposable paper filters to control fugitive particulate matter emissions	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11	0.551 lb/hr of particulate matter
	OAC rule 3745-21-09(U)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b below.
	OAC rule 3745-31-05 (PTI 16-195)	See A.2.c below.

2. **Additional Terms and Conditions**

- (a) Although the requirements of OAC rule 3745-21-09(U) allow for an exemption from applicable VOC content limitations, the daily usage exemption allowed in accordance with OAC rule 3745-21-09(U)(2)(e)(ii) is not part of the federally-approved SIP (for the Cleveland/Akron ozone area). The rule is currently being revised to reflect an exemption level (3 gallons per day) that will be acceptable to USEPA. The Ohio EPA has received confirmation of this in writing; therefore, the 3.0 gallons per day usage restriction in Section B.1 below will apply as the exemption level while OAC rule 3745-21-09(U) is being revised and SIP approval by USEPA is being promulgated.  
 The total annual hazardous air pollutant (HAP) emissions from this facility shall not exceed 20.2 tons per year, and the individual HAP emissions rate shall not exceed 9.9 tons per year. To ensure these limits are met, Aircraft Braking System Corporation is committing to meet the operational restrictions listed in Section B of this permit.  
 The best available technology (BAT) determination for PTI 16-195 was determined to be compliance with a daily usage restriction that is less stringent than the daily usage limit established in Section B.1 of this permit.

B. **Operational Restrictions**

1. The permittee shall employ no more than 3.0 gallons of coating in any one day in this emissions unit.
2. The permittee shall operate the disposable paper filtration system when this emissions unit is in operation.
3. The maximum annual coating usage for this facility shall not exceed 5,980 gallons, based on a rolling, 365-day summation of coating usage.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s) Maximum Allowable Cumulative Facility-wide Coating Usage (gallons)

1 500  
 1-2 1000  
 1-3 1500  
 1-4 2000  
 1-5 2500  
 1-6 3000  
 1-7 3500  
 1-8 4000  
 1-9 4500  
 1-10 5000  
 1-11 5500  
 1-12 5980

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 365-day summation of the coating usage.

4. Each coating employed in this emissions unit shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.
  5. Cleanup solvents used shall contain no hazardous air pollutants.
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall collect and record the following information each day for the coating line:
    - a. the name and identification number of each coating employed;
    - b. the volume, in gallons, of each coating employed;
    - c. the total volume, in gallons, of all of the coatings employed; and
    - d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 365-day summation of the coating usage.
  2. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the facility-wide cumulative coating usage for each calendar month.
  3. Beginning after the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, 365-day summation of the coating usage on a facility-wide basis.
  4. The permittee shall maintain a record of whether or not the disposable paper filtration system was in service when the emissions unit was in operation.
  5. The permittee shall maintain monthly records of the following information:
    - a. the name and identification number of each coating employed, during the month;
    - b. the total HAP content of each coating, as employed, in pounds per gallon of coating;
    - c. the name and content of each individual HAP of each coating, as employed, in pounds per gallon;
    - d. the name and identification of each cleanup solvent employed; and
    - e. the total HAP content of each cleanup solvent employed, in pounds per gallon.
- D. Reporting Requirements**
1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
  2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the disposable paper filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 45 days after the event occurs.
  3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day facility-wide coating usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide coating usage levels.
  4. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.
  5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the coating line employed any coating with an individual HAP content or total HAP content greater than the applicable maximum HAP contents specified in Section B.4 of this permit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
  6. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the coating line employed a cleanup solvent that contains any of the 188 hazardous air pollutants. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
  7. The permittee shall submit annual reports which specify the total coating usage, the individual HAP emissions, and the total HAP emissions for this emissions unit and the individual HAP emissions and the total HAP

emissions for the entire facility for the previous calendar year. These reports shall include the emission calculations and shall be submitted by February 15 of each year.

**E. Testing Requirements**

1. Compliance with the emission limitations and the operational restriction in Sections A.1, A.2, and B. of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

Emission Limitation:

0.551 lb/hr of particulate matter

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

E = particulate emissions 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 = fractional control efficiency of the control equipment

If required, emission testing shall be performed in accordance with the procedures in 40 CFR Part 60, Appendix A, Method 5.

Operational Restriction:

use of no more than 3 gallons of coatings per day

Applicable Compliance Method:

Daily records shall be maintained of the daily usage of all coatings employed.

Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 5,980 gallons, based on a rolling, 365-day summation of coating usage.

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all coatings employed in the individual coating lines. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

Operational Restriction:

Coatings employed shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.

Applicable Compliance Method:

Formulation data shall be used to determine the hazardous air pollutant content of each coating employed.

Operational Restriction:

Cleanup solvents used shall contain no hazardous air pollutants.

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all cleanup solvents employed in the individual coating lines. Formulation data shall be used to determine the hazardous air pollutant content of each solvent employed.

**F. Miscellaneous Requirements**

1. Sections A, B, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1677010999 Emissions Unit ID: K003 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Misc. metal parts paint spray booth with disposable paper filters to control fugitive particulate matter emissions	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11	0.551 lb/hr of particulate matter
	OAC rule 3745-21-09(U)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b below.
	OAC rule 3745-31-05 (PTI 16-195)	See A.2.c below.

**2. Additional Terms and Conditions**

- (a) Although the requirements of OAC rule 3745-21-09(U) allow for an exemption from applicable VOC content limitations, the daily usage exemption allowed in accordance with OAC rule 3745-21-09(U)(2)(e)(ii) is not part of the federally-approved SIP (for the Cleveland/Akron ozone area). The rule is currently being revised to reflect an exemption level (3 gallons per day) that will be acceptable to USEPA. The Ohio EPA has received confirmation of this in writing; therefore, the 3.0 gallons per day usage restriction in Section B.1 below will apply as the exemption level while OAC rule 3745-21-09(U) is being revised and SIP approval by USEPA is being promulgated.  
 The total annual hazardous air pollutant (HAP) emissions from this facility shall not exceed 20.2 tons per year, and the individual HAP emissions rate shall not exceed 9.9 tons per year. To ensure these limits are met, Aircraft Braking System Corporation is committing to meet the operational restrictions listed in Section B of this permit.  
 The best available technology (BAT) determination for PTI 16-195 was determined to be compliance with a daily usage restriction that is less stringent than the daily usage limit established in Section B.1 of this permit.

**B. Operational Restrictions**

1. The permittee shall employ no more than 3.0 gallons of coating in any one day in this emissions unit.
2. The permittee shall operate the disposable paper filtration system when this emissions unit is in operation.
3. The maximum annual coating usage for this facility shall not exceed 5,980 gallons, based on a rolling, 365-day summation of coating usage.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s) Maximum Allowable Cumulative Facility-wide Coating Usage (gallons)

- 1 500
- 1-2 1000
- 1-3 1500
- 1-4 2000
- 1-5 2500
- 1-6 3000
- 1-7 3500
- 1-8 4000
- 1-9 4500
- 1-10 5000
- 1-11 5500
- 1-12 5980

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 365-day summation of the coating usage.

4. Each coating employed in this emissions unit shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.
5. Cleanup solvents used shall contain no hazardous air pollutants.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each day for the coating line:

- a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed;
  - c. the total volume, in gallons, of all of the coatings employed; and
  - d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 365-day summation of the coating usage.
2. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the facility-wide cumulative coating usage for each calendar month.
  3. Beginning after the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, 365-day summation of the coating usage on a facility-wide basis.
  4. The permittee shall maintain a record of whether or not the disposable paper filtration system was in service when the emissions unit was in operation.
  5. The permittee shall maintain monthly records of the following information:
    - a. the name and identification number of each coating employed, during the month;
    - b. the total HAP content of each coating, as employed, in pounds per gallon of coating;
    - c. the name and content of each individual HAP of each coating, as employed, in pounds per gallon;
    - d. the name and identification of each cleanup solvent employed; and
    - e. the total HAP content of each cleanup solvent employed, in pounds per gallon.
- D. Reporting Requirements**
1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
  2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the disposable paper filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 45 days after the event occurs.
  3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day facility-wide coating usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide coating usage levels.
  4. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.
  5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the coating line employed any coating with an individual HAP content or total HAP content greater than the applicable maximum HAP contents specified in Section B.4 of this permit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
  6. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the coating line employed a cleanup solvent that contains any of the 188 hazardous air pollutants. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
  7. The permittee shall submit annual reports which specify the total coating usage, the individual HAP emissions, and the total HAP emissions for this emissions unit and the individual HAP emissions and the total HAP emissions for the entire facility for the previous calendar year. These reports shall include the emission calculations and shall be submitted by February 15 of each year.
- E. Testing Requirements**
1. Compliance with the emission limitations and the operational restriction in Sections A.1, A.2, and B. of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
20% opacity as a 6-minute average  
Applicable Compliance Method:  
OAC rule 3745-17-03(B)(1)  
Emission Limitation:  
0.551 lb/hr of particulate matter  
Applicable Compliance Method:  
To determine the actual worst case particulate emissions rate, the following equation shall be used:  
$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$
  
$$E = \text{particulate emissions rate (lbs/hr)}$$

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 = fractional control efficiency of the control equipment

If required, emission testing shall be performed in accordance with the procedures in 40 CFR Part 60, Appendix A, Method 5.

Operational Restriction:

use of no more than 3 gallons of coatings per day

Applicable Compliance Method:

Daily records shall be maintained of the daily usage of all coatings employed.

Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 5,980 gallons, based on a rolling, 365-day summation of coating usage.

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all coatings employed in the individual coating lines. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

Operational Restriction:

Coatings employed shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.

Applicable Compliance Method:

Formulation data shall be used to determine the hazardous air pollutant content of each coating employed.

Operational Restriction:

Cleanup solvents used shall contain no hazardous air pollutants.

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all cleanup solvents employed in the individual coating lines. Formulation data shall be used to determine the hazardous air pollutant content of each solvent employed.

**F. Miscellaneous Requirements**

1. Sections A, B, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1677010999 Emissions Unit ID: K006 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Misc. metal parts paint spray booth with disposable paper filters to control fugitive particulate matter emissions	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11	0.551 lb/hr of particulate matter

OAC rule 3745-21-09(U) See A.2.a below.  
 OAC rule 3745-35-07 See A.2.b below.  
 OAC rule 3745-31-05 See A.2.c below.  
 (PTI 16-1191)

**2. Additional Terms and Conditions**

- (a) Although the requirements of OAC rule 3745-21-09(U) allow for an exemption from applicable VOC content limitations, the daily usage exemption allowed in accordance with OAC rule 3745-21-09(U)(2)(e)(ii) is not part of the federally-approved SIP (for the Cleveland/Akron ozone area). The rule is currently being revised to reflect an exemption level (3 gallons per day) that will be acceptable to USEPA. The Ohio EPA has received confirmation of this in writing; therefore, the 3.0 gallons per day usage restriction in Section B.1 below will apply as the exemption level while OAC rule 3745-21-09(U) is being revised and SIP approval by USEPA is being promulgated.  
 The total annual hazardous air pollutant (HAP) emissions from this facility shall not exceed 20.2 tons per year, and the individual HAP emissions rate shall not exceed 9.9 tons per year. To ensure these limits are met, Aircraft Braking System Corporation is committing to meet the operational restrictions listed in Section B of this permit.  
 The best available technology (BAT) determination for PTI 16-195 was determined to be compliance with a daily usage restriction that is less stringent than the daily usage limit established in Section B.1 of this permit.

**B. Operational Restrictions**

- 1. The permittee shall employ no more than 3.0 gallons of coating in any one day in this emissions unit.
- 2. The permittee shall operate the disposable paper filtration system when this emissions unit is in operation.
- 3. The maximum annual coating usage for this facility shall not exceed 5,980 gallons, based on a rolling, 365-day summation of coating usage.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s) Maximum Allowable Cumulative Facility-wide Coating Usage (gallons)

1 500  
 1-2 1000  
 1-3 1500  
 1-4 2000  
 1-5 2500  
 1-6 3000  
 1-7 3500  
 1-8 4000  
 1-9 4500  
 1-10 5000  
 1-11 5500  
 1-12 5980

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 365-day summation of the coating usage.

- 4. Each coating employed in this emissions unit shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.
- 5. Cleanup solvents used shall contain no hazardous air pollutants.

**C. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall collect and record the following information each day for the coating line:
  - a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed;
  - c. the total volume, in gallons, of all of the coatings employed; and
  - d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 365-day summation of the coating usage.
- 2. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the facility-wide cumulative coating usage for each calendar month.
- 3. Beginning after the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, 365-day summation of the coating usage on a facility-wide basis.
- 4. The permittee shall maintain a record of whether or not the disposable paper filtration system was in service when the emissions unit was in operation.
- 5. The permittee shall maintain monthly records of the following information:
  - a. the name and identification number of each coating employed, during the month;
  - b. the total HAP content of each coating, as employed, in pounds per gallon of coating;

c. the name and content of each individual HAP of each coating, as employed, in pounds per gallon;

d. the name and identification of each cleanup solvent employed; and

e. the total HAP content of each cleanup solvent employed, in pounds per gallon.

**D. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the disposable paper filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 45 days after the event occurs.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day facility-wide coating usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide coating usage levels.
4. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.
5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the coating line employed any coating with an individual HAP content or total HAP content greater than the applicable maximum HAP contents specified in Section B.4 of this permit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
6. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the coating line employed a cleanup solvent that contains any of the 188 hazardous air pollutants. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The permittee shall submit annual reports which specify the total coating usage, the individual HAP emissions, and the total HAP emissions for this emissions unit and the individual HAP emissions and the total HAP emissions for the entire facility for the previous calendar year. These reports shall include the emission calculations and shall be submitted by February 15 of each year.

**E. Testing Requirements**

1. Compliance with the emission limitations and the operational restriction in Sections A.1, A.2, and B. of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
  
20% opacity as a 6-minute average  
  
Applicable Compliance Method:  
  
OAC rule 3745-17-03(B)(1)  
Emission Limitation:  
  
0.551 lb/hr of particulate matter  
  
Applicable Compliance Method:  
  
To determine the actual worst case particulate emissions rate, the following equation shall be used:  
  
$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$
  
  
$$E = \text{particulate emissions rate (lbs/hr)}$$
  
  
$$TE = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used}$$
  
  
$$CE = \text{fractional control efficiency of the control equipment}$$
  
  
If required, emission testing shall be performed in accordance with the procedures in 40 CFR Part 60, Appendix A, Method 5.  
Operational Restriction:  
  
use of no more than 3 gallons of coatings per day  
  
Applicable Compliance Method:  
  
Daily records shall be maintained of the daily usage of all coatings employed.  
Operational Restriction:  
  
The maximum annual coating usage for this facility shall not exceed 5,980 gallons, based on a rolling, 365-day summation of coating usage.  
  
Applicable Compliance Method:  
  
Daily records shall be maintained that record the usage of all coatings employed in the individual coating lines. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

Operational Restriction:

Coatings employed shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.

Applicable Compliance Method:

Formulation data shall be used to determine the hazardous air pollutant content of each coating employed.  
Operational Restriction:

Cleanup solvents used shall contain no hazardous air pollutants.

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all cleanup solvents employed in the individual coating lines. Formulation data shall be used to determine the hazardous air pollutant content of each solvent employed.

**F. Miscellaneous Requirements**

1. Sections A, B, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1677010999 Emissions Unit ID: K007 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Misc. metal parts paint spray booth with disposable paper filters to control fugitive particulate matter emissions	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11	0.551 lb/hr of particulate matter
	OAC rule 3745-21-09(U)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b below.
	OAC rule 3745-31-05 (PTI 16-1540)	See A.2.c below.

**2. Additional Terms and Conditions**

- (a) Although the requirements of OAC rule 3745-21-09(U) allow for an exemption from applicable VOC content limitations, the daily usage exemption allowed in accordance with OAC rule 3745-21-09(U)(2)(e)(ii) is not part of the federally-approved SIP (for the Cleveland/Akron ozone area). The rule is currently being revised to reflect an exemption level (3 gallons per day) that will be acceptable to USEPA. The Ohio EPA has received confirmation of this in writing; therefore, the 3.0 gallons per day usage restriction in Section B.1 below will apply as the exemption level while OAC rule 3745-21-09(U) is being revised and SIP approval by USEPA is being promulgated.  
The total annual hazardous air pollutant (HAP) emissions from this facility shall not exceed 20.2 tons per year, and the individual HAP emissions rate shall not exceed 9.9 tons per year. To ensure these limits are met, Aircraft Braking System Corporation is committing to meet the operational restrictions listed in Section B of this permit.  
The best available technology (BAT) determination for PTI 16-195 was determined to be compliance with a daily usage restriction that is less stringent than the daily usage limit established in Section B.1 of this permit.

**B. Operational Restrictions**

1. The permittee shall employ no more than 3.0 gallons of coating in any one day in this emissions unit.
2. The permittee shall operate the disposable paper filtration system when this emissions unit is in operation.
3. The maximum annual coating usage for this facility shall not exceed 5,980 gallons, based on a rolling, 365-day summation of coating usage.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s) Maximum Allowable Cumulative Facility-wide Coating Usage (gallons)

1 500  
 1-2 1000  
 1-3 1500  
 1-4 2000  
 1-5 2500  
 1-6 3000  
 1-7 3500  
 1-8 4000  
 1-9 4500  
 1-10 5000  
 1-11 5500  
 1-12 5980

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 365-day summation of the coating usage.

4. Each coating employed in this emissions unit shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.
  5. Cleanup solvents used shall contain no hazardous air pollutants.
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall collect and record the following information each day for the coating line:
    - a. the name and identification number of each coating employed;
    - b. the volume, in gallons, of each coating employed;
    - c. the total volume, in gallons, of all of the coatings employed; and
    - d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 365-day summation of the coating usage.
  2. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the facility-wide cumulative coating usage for each calendar month.
  3. Beginning after the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, 365-day summation of the coating usage on a facility-wide basis.
  4. The permittee shall maintain a record of whether or not the disposable paper filtration system was in service when the emissions unit was in operation.
  5. The permittee shall maintain monthly records of the following information:
    - a. the name and identification number of each coating employed, during the month;
    - b. the total HAP content of each coating, as employed, in pounds per gallon of coating;
    - c. the name and content of each individual HAP of each coating, as employed, in pounds per gallon;
    - d. the name and identification of each cleanup solvent employed; and
    - e. the total HAP content of each cleanup solvent employed, in pounds per gallon.
- D. Reporting Requirements**
1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
  2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the disposable paper filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 45 days after the event occurs.
  3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day facility-wide coating usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide coating usage levels.
  4. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.
  5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the coating line employed any coating with an individual HAP content or total

HAP content greater than the applicable maximum HAP contents specified in Section B.4 of this permit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

6. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the coating line employed a cleanup solvent that contains any of the 188 hazardous air pollutants. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The permittee shall submit annual reports which specify the total coating usage, the individual HAP emissions, and the total HAP emissions for this emissions unit and the individual HAP emissions and the total HAP emissions for the entire facility for the previous calendar year. These reports shall include the emission calculations and shall be submitted by February 15 of each year.

**E. Testing Requirements**

1. Compliance with the emission limitations and the operational restriction in Sections A.1, A.2, and B. of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

Emission Limitation:

0.551 lb/hr of particulate matter

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

$E = \text{particulate emissions rate (lbs/hr)}$

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 = fractional control efficiency of the control equipment

If required, emission testing shall be performed in accordance with the procedures in 40 CFR Part 60, Appendix A, Method 5.

Operational Restriction:

use of no more than 3 gallons of coatings per day

Applicable Compliance Method:

Daily records shall be maintained of the daily usage of all coatings employed.

Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 5,980 gallons, based on a rolling, 365-day summation of coating usage.

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all coatings employed in the individual coating lines. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

Operational Restriction:

Coatings employed shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.

Applicable Compliance Method:

Formulation data shall be used to determine the hazardous air pollutant content of each coating employed.

Operational Restriction:

Cleanup solvents used shall contain no hazardous air pollutants.

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all cleanup solvents employed in the individual coating lines. Formulation data shall be used to determine the hazardous air pollutant content of each solvent employed.

**F. Miscellaneous Requirements**

1. Sections A, B, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1677010999 Emissions Unit ID: K008 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
One paint spray booth (Plant B - Dept. 656; formerly part of K002) with disposable paper filters to control fugitive particulate matter emissions	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11	0.551 lb/hr of particulate matter
	OAC rule 3745-21-09(U)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b below.
	OAC rule 3745-31-05 (PTI 16-195)	See A.2.c below.

**2. Additional Terms and Conditions**

- (a) Although the requirements of OAC rule 3745-21-09(U) allow for an exemption from applicable VOC content limitations, the daily usage exemption allowed in accordance with OAC rule 3745-21-09(U)(2)(e)(ii) is not part of the federally-approved SIP (for the Cleveland/Akron ozone area). The rule is currently being revised to reflect an exemption level (3 gallons per day) that will be acceptable to USEPA. The Ohio EPA has received confirmation of this in writing; therefore, the 3.0 gallons per day usage restriction in Section B.1 below will apply as the exemption level while OAC rule 3745-21-09(U) is being revised and SIP approval by USEPA is being promulgated.  
 The total annual hazardous air pollutant (HAP) emissions from this facility shall not exceed 20.2 tons per year, and the individual HAP emissions rate shall not exceed 9.9 tons per year. To ensure these limits are met, Aircraft Braking System Corporation is committing to meet the operational restrictions listed in Section B of this permit.  
 The best available technology (BAT) determination for PTI 16-195 was determined to be compliance with a daily usage restriction that is less stringent than the daily usage limit established in Section B.1 of this permit.

**B. Operational Restrictions**

1. The permittee shall employ no more than 3.0 gallons of coating in any one day in this emissions unit.
2. The permittee shall operate the disposable paper filtration system when this emissions unit is in operation.
3. The maximum annual coating usage for this facility shall not exceed 5,980 gallons, based on a rolling, 365-day summation of coating usage.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s) Maximum Allowable Cumulative Facility-wide Coating Usage (gallons)

- 1 500
- 1-2 1000
- 1-3 1500
- 1-4 2000
- 1-5 2500
- 1-6 3000
- 1-7 3500
- 1-8 4000
- 1-9 4500
- 1-10 5000
- 1-11 5500
- 1-12 5980

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 365-day summation of the coating usage.

4. Each coating employed in this emissions unit shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.
5. Cleanup solvents used shall contain no hazardous air pollutants.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each day for the coating line:
  - a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed;
  - c. the total volume, in gallons, of all of the coatings employed; and
  - d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 365-day summation of the coating usage.
2. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the facility-wide cumulative coating usage for each calendar month.
3. Beginning after the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, 365-day summation of the coating usage on a facility-wide basis.
4. The permittee shall maintain a record of whether or not the disposable paper filtration system was in service when the emissions unit was in operation.
5. The permittee shall maintain monthly records of the following information:
  - a. the name and identification number of each coating employed, during the month;
  - b. the total HAP content of each coating, as employed, in pounds per gallon of coating;
  - c. the name and content of each individual HAP of each coating, as employed, in pounds per gallon;
  - d. the name and identification of each cleanup solvent employed; and
  - e. the total HAP content of each cleanup solvent employed, in pounds per gallon.

**D. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the disposable paper filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 45 days after the event occurs.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day facility-wide coating usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide coating usage levels.
4. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.
5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the coating line employed any coating with an individual HAP content or total HAP content greater than the applicable maximum HAP contents specified in Section B.4 of this permit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
6. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the coating line employed a cleanup solvent that contains any of the 188 hazardous air pollutants. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The permittee shall submit annual reports which specify the total coating usage, the individual HAP emissions, and the total HAP emissions for this emissions unit and the individual HAP emissions and the total HAP emissions for the entire facility for the previous calendar year. These reports shall include the emission calculations and shall be submitted by February 15 of each year.

**E. Testing Requirements**

1. Compliance with the emission limitations and the operational restriction in Sections A.1, A.2, and B. of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

Emission Limitation:

0.551 lb/hr of particulate matter

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

E = particulate emissions 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 = fractional control efficiency of the control equipment

If required, emission testing shall be performed in accordance with the procedures in 40 CFR Part 60, Appendix A, Method 5.

Operational Restriction:

use of no more than 3 gallons of coatings per day

Applicable Compliance Method:

Daily records shall be maintained of the daily usage of all coatings employed.

Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 5,980 gallons, based on a rolling, 365-day summation of coating usage.

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all coatings employed in the individual coating lines. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

Operational Restriction:

Coatings employed shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.

Applicable Compliance Method:

Formulation data shall be used to determine the hazardous air pollutant content of each coating employed.

Operational Restriction:

Cleanup solvents used shall contain no hazardous air pollutants.

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all cleanup solvents employed in the individual coating lines. Formulation data shall be used to determine the hazardous air pollutant content of each solvent employed.

**F. Miscellaneous Requirements**

1. Sections A, B, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1677010999 Emissions Unit ID: K009 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall

not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
One paint spray booth (Plant B - Dept. 656; formerly part of K003) with disposable paper filters to control fugitive particulate matter emissions	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11	0.551 lb/hr of particulate matter
	OAC rule 3745-21-09(U)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b below.
	OAC rule 3745-31-05 (PTI 16-195)	See A.2.c below.

**2. Additional Terms and Conditions**

- (a) Although the requirements of OAC rule 3745-21-09(U) allow for an exemption from applicable VOC content limitations, the daily usage exemption allowed in accordance with OAC rule 3745-21-09(U)(2)(e)(ii) is not part of the federally-approved SIP (for the Cleveland/Akron ozone area). The rule is currently being revised to reflect an exemption level (3 gallons per day) that will be acceptable to USEPA. The Ohio EPA has received confirmation of this in writing; therefore, the 3.0 gallons per day usage restriction in Section B.1 below will apply as the exemption level while OAC rule 3745-21-09(U) is being revised and SIP approval by USEPA is being promulgated.  
 The total annual hazardous air pollutant (HAP) emissions from this facility shall not exceed 20.2 tons per year, and the individual HAP emissions rate shall not exceed 9.9 tons per year. To ensure these limits are met, Aircraft Braking System Corporation is committing to meet the operational restrictions listed in Section B of this permit.  
 The best available technology (BAT) determination for PTI 16-195 was determined to be compliance with a daily usage restriction that is less stringent than the daily usage limit established in Section B.1 of this permit.

**B. Operational Restrictions**

1. The permittee shall employ no more than 3.0 gallons of coating in any one day in this emissions unit.
2. The permittee shall operate the disposable paper filtration system when this emissions unit is in operation.
3. The maximum annual coating usage for this facility shall not exceed 5,980 gallons, based on a rolling, 365-day summation of coating usage.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s) Maximum Allowable Cumulative Facility-wide Coating Usage (gallons)

1	500
1-2	1000
1-3	1500
1-4	2000
1-5	2500
1-6	3000
1-7	3500
1-8	4000
1-9	4500
1-10	5000
1-11	5500
1-12	5980

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 365-day summation of the coating usage.

4. Each coating employed in this emissions unit shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.
5. Cleanup solvents used shall contain no hazardous air pollutants.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each day for the coating line:
  - a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed;
  - c. the total volume, in gallons, of all of the coatings employed; and
  - d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 365-day summation of the coating usage.
2. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the facility-wide cumulative coating usage for each calendar month.
3. Beginning after the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, 365-day summation of the coating usage on a facility-wide basis.

4. The permittee shall maintain a record of whether or not the disposable paper filtration system was in service when the emissions unit was in operation.
  5. The permittee shall maintain monthly records of the following information:
    - a. the name and identification number of each coating employed, during the month;
    - b. the total HAP content of each coating, as employed, in pounds per gallon of coating;
    - c. the name and content of each individual HAP of each coating, as employed, in pounds per gallon;
    - d. the name and identification of each cleanup solvent employed; and
    - e. the total HAP content of each cleanup solvent employed, in pounds per gallon.
- D. Reporting Requirements**
1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
  2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the disposable paper filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 45 days after the event occurs.
  3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day facility-wide coating usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide coating usage levels.
  4. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.
  5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the coating line employed any coating with an individual HAP content or total HAP content greater than the applicable maximum HAP contents specified in Section B.4 of this permit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
  6. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the coating line employed a cleanup solvent that contains any of the 188 hazardous air pollutants. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
  7. The permittee shall submit annual reports which specify the total coating usage, the individual HAP emissions, and the total HAP emissions for this emissions unit and the individual HAP emissions and the total HAP emissions for the entire facility for the previous calendar year. These reports shall include the emission calculations and shall be submitted by February 15 of each year.
- E. Testing Requirements**
1. Compliance with the emission limitations and the operational restriction in Sections A.1, A.2, and B. of these terms and conditions shall be determined in accordance with the following methods:
 

Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

Emission Limitation:

0.551 lb/hr of particulate matter

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

E = particulate emissions 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 = fractional control efficiency of the control equipment

If required, emission testing shall be performed in accordance with the procedures in 40 CFR Part 60, Appendix A, Method 5.

Operational Restriction:

use of no more than 3 gallons of coatings per day

Applicable Compliance Method:

Daily records shall be maintained of the daily usage of all coatings employed.

Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 5,980 gallons, based on a rolling, 365-day summation of coating usage.

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all coatings employed in the individual coating lines. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

Operational Restriction:

Coatings employed shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.

Applicable Compliance Method:

Formulation data shall be used to determine the hazardous air pollutant content of each coating employed.

Operational Restriction:

Cleanup solvents used shall contain no hazardous air pollutants.

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all cleanup solvents employed in the individual coating lines. Formulation data shall be used to determine the hazardous air pollutant content of each solvent employed.

**F. Miscellaneous Requirements**

1. Sections A, B, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1677010999 Emissions Unit ID: K010 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
One paint spray booth (Plant B - Dept. 656; formerly part of K003) with disposable paper filters to control fugitive particulate matter emissions	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11	0.551 lb/hr of particulate matter
	OAC rule 3745-21-09(U)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b below.
	OAC rule 3745-31-05 (PTI 16-195)	See A.2.c below.

**2. Additional Terms and Conditions**

- (a) Although the requirements of OAC rule 3745-21-09(U) allow for an exemption from applicable VOC content limitations, the daily usage exemption allowed in accordance with OAC rule 3745-21-09(U)(2)(e)(ii) is not part of the federally-approved SIP (for the Cleveland/Akron ozone area). The rule is currently being revised to reflect an exemption level (3 gallons per day) that will be acceptable to USEPA. The Ohio EPA has received confirmation of this in writing; therefore, the 3.0 gallons per day usage restriction in Section B.1 below will apply as the exemption level while OAC rule 3745-21-09(U)

is being revised and SIP approval by USEPA is being promulgated.

The total annual hazardous air pollutant (HAP) emissions from this facility shall not exceed 20.2 tons per year, and the individual HAP emissions rate shall not exceed 9.9 tons per year. To ensure these limits are met, Aircraft Braking System Corporation is committing to meet the operational restrictions listed in Section B of this permit.

The best available technology (BAT) determination for PT1 16-195 was determined to be compliance with a daily usage restriction that is less stringent than the daily usage limit established in Section B.1 of this permit.

**B. Operational Restrictions**

1. The permittee shall employ no more than 3.0 gallons of coating in any one day in this emissions unit.
2. The permittee shall operate the disposable paper filtration system when this emissions unit is in operation.
3. The maximum annual coating usage for this facility shall not exceed 5,980 gallons, based on a rolling, 365-day summation of coating usage.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s) Maximum Allowable Cumulative Facility-wide Coating Usage (gallons)

1	500
1-2	1000
1-3	1500
1-4	2000
1-5	2500
1-6	3000
1-7	3500
1-8	4000
1-9	4500
1-10	5000
1-11	5500
1-12	5980

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 365-day summation of the coating usage.

4. Each coating employed in this emissions unit shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.
5. Cleanup solvents used shall contain no hazardous air pollutants.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each day for the coating line:
  - a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed;
  - c. the total volume, in gallons, of all of the coatings employed; and
  - d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 365-day summation of the coating usage.
2. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the facility-wide cumulative coating usage for each calendar month.
3. Beginning after the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, 365-day summation of the coating usage on a facility-wide basis.
4. The permittee shall maintain a record of whether or not the disposable paper filtration system was in service when the emissions unit was in operation.
5. The permittee shall maintain monthly records of the following information:
  - a. the name and identification number of each coating employed, during the month;
  - b. the total HAP content of each coating, as employed, in pounds per gallon of coating;
  - c. the name and content of each individual HAP of each coating, as employed, in pounds per gallon;
  - d. the name and identification of each cleanup solvent employed; and
  - e. the total HAP content of each cleanup solvent employed, in pounds per gallon.

**D. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the disposable paper filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 45 days after the event occurs.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day facility-wide coating usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide coating usage levels.
4. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.
5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the coating line employed any coating with an individual HAP content or total HAP content greater than the applicable maximum HAP contents specified in Section B.4 of this permit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
6. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the coating line employed a cleanup solvent that contains any of the 188 hazardous air pollutants. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The permittee shall submit annual reports which specify the total coating usage, the individual HAP emissions, and the total HAP emissions for this emissions unit and the individual HAP emissions and the total HAP emissions for the entire facility for the previous calendar year. These reports shall include the emission calculations and shall be submitted by February 15 of each year.

**E. Testing Requirements**

1. Compliance with the emission limitations and the operational restriction in Sections A.1, A.2, and B. of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
  
20% opacity as a 6-minute average  
  
Applicable Compliance Method:  
  
OAC rule 3745-17-03(B)(1)  
Emission Limitation:  
  
0.551 lb/hr of particulate matter  
  
Applicable Compliance Method:  
  
To determine the actual worst case particulate emissions rate, the following equation shall be used:  
  
$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$
  
  
$$E = \text{particulate emissions rate (lbs/hr)}$$
  
  
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 = fractional control efficiency of the control equipment  
  
If required, emission testing shall be performed in accordance with the procedures in 40 CFR Part 60, Appendix A, Method 5.  
Operational Restriction:  
  
use of no more than 3 gallons of coatings per day  
  
Applicable Compliance Method:  
  
Daily records shall be maintained of the daily usage of all coatings employed.  
Operational Restriction:  
  
The maximum annual coating usage for this facility shall not exceed 5,980 gallons, based on a rolling, 365-day summation of coating usage.  
  
Applicable Compliance Method:  
  
Daily records shall be maintained that record the usage of all coatings employed in the individual coating lines. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.  
Operational Restriction:  
  
Coatings employed shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.  
  
Applicable Compliance Method:  
  
Formulation data shall be used to determine the hazardous air pollutant content of each coating employed.  
Operational Restriction:  
  
Cleanup solvents used shall contain no hazardous air pollutants.  
  
Applicable Compliance Method:  
  
Daily records shall be maintained that record the usage of all cleanup solvents employed in the individual coating lines. Formulation data shall be used to determine the hazardous air pollutant content of each solvent employed.

**F. Miscellaneous Requirements**

1. Sections A, B, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

**Facility ID: 1677010999 Emissions Unit ID: R001 Issuance type: Final State Permit To Operate**

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Misc. metal parts paint spray booth with disposable paper filters to control fugitive particulate matter emissions	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11	0.551 lb/hr of particulate matter
	OAC rule 3745-21-09(U)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b below.
	OAC rule 3745-31-05 (PTI 16-195)	See A.2.c below.

**2. Additional Terms and Conditions**

- (a) Although the requirements of OAC rule 3745-21-09(U) allow for an exemption from applicable VOC content limitations, the daily usage exemption allowed in accordance with OAC rule 3745-21-09(U)(2)(e)(ii) is not part of the federally-approved SIP (for the Cleveland/Akron ozone area). The rule is currently being revised to reflect an exemption level (3 gallons per day) that will be acceptable to USEPA. The Ohio EPA has received confirmation of this in writing; therefore, the 3.0 gallons per day usage restriction in Section B.1 below will apply as the exemption level while OAC rule 3745-21-09(U) is being revised and SIP approval by USEPA is being promulgated.
 

The total annual hazardous air pollutant (HAP) emissions from this facility shall not exceed 20.2 tons per year, and the individual HAP emissions rate shall not exceed 9.9 tons per year. To ensure these limits are met, Aircraft Braking System Corporation is committing to meet the operational restrictions listed in Section B of this permit.

The best available technology (BAT) determination for PTI 16-195 was determined to be compliance with a daily usage restriction that is less stringent than the daily usage limit established in Section B.1 of this permit.

**B. Operational Restrictions**

1. The permittee shall employ no more than 3.0 gallons of coating in any one day in this emissions unit.
2. The permittee shall operate the disposable paper filtration system when this emissions unit is in operation.
3. The maximum annual coating usage for this facility shall not exceed 5,980 gallons, based on a rolling, 365-day summation of coating usage.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s) Maximum Allowable Cumulative Facility-wide Coating Usage (gallons)

- 1 500
- 1-2 1000
- 1-3 1500
- 1-4 2000

1-5 2500

1-6 3000  
 1-7 3500  
 1-8 4000  
 1-9 4500  
 1-10 5000  
 1-11 5500  
 1-12 5980

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 365-day summation of the coating usage.

4. Each coating employed in this emissions unit shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.
  5. Cleanup solvents used shall contain no hazardous air pollutants.
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall collect and record the following information each day for the coating line:
    - a. the name and identification number of each coating employed;
    - b. the volume, in gallons, of each coating employed;
    - c. the total volume, in gallons, of all of the coatings employed; and
    - d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 365-day summation of the coating usage.
  2. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the facility-wide cumulative coating usage for each calendar month.
  3. Beginning after the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, 365-day summation of the coating usage on a facility-wide basis.
  4. The permittee shall maintain a record of whether or not the disposable paper filtration system was in service when the emissions unit was in operation.
  5. The permittee shall maintain monthly records of the following information:
    - a. the name and identification number of each coating employed, during the month;
    - b. the total HAP content of each coating, as employed, in pounds per gallon of coating;
    - c. the name and content of each individual HAP of each coating, as employed, in pounds per gallon;
    - d. the name and identification of each cleanup solvent employed; and
    - e. the total HAP content of each cleanup solvent employed, in pounds per gallon.
- D. Reporting Requirements**
1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
  2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the disposable paper filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 45 days after the event occurs.
  3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day facility-wide coating usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide coating usage levels.
  4. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.
  5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the coating line employed any coating with an individual HAP content or total HAP content greater than the applicable maximum HAP contents specified in Section B.4 of this permit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
  6. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the coating line employed a cleanup solvent that contains any of the 188 hazardous air pollutants. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
  7. The permittee shall submit annual reports which specify the total coating usage, the individual HAP emissions, and the total HAP emissions for this emissions unit and the individual HAP emissions and the total HAP emissions for the entire facility for the previous calendar year. These reports shall include the emission calculations and shall be submitted by February 15 of each year.
- E. Testing Requirements**
1. Compliance with the emission limitations and the operational restriction in Sections A.1, A.2, and B. of these terms

and conditions shall be determined in accordance with the following methods:

Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

Emission Limitation:

0.551 lb/hr of particulate matter

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

$E = \text{particulate emissions rate (lbs/hr)}$

$TE = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used}$

$CE = \text{fractional control efficiency of the control equipment}$

If required, emission testing shall be performed in accordance with the procedures in 40 CFR Part 60, Appendix A, Method 5.

Operational Restriction:

use of no more than 3 gallons of coatings per day

Applicable Compliance Method:

Daily records shall be maintained of the daily usage of all coatings employed.

Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 5,980 gallons, based on a rolling, 365-day summation of coating usage.

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all coatings employed in the individual coating lines. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

Operational Restriction:

Coatings employed shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.

Applicable Compliance Method:

Formulation data shall be used to determine the hazardous air pollutant content of each coating employed.

Operational Restriction:

Cleanup solvents used shall contain no hazardous air pollutants.

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all cleanup solvents employed in the individual coating lines. Formulation data shall be used to determine the hazardous air pollutant content of each solvent employed.

**F. Miscellaneous Requirements**

1. Sections A, B, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

**Facility ID: 1677010999 Emissions Unit ID: R002 Issuance type: Final State Permit To Operate**

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law

only with the exception of those listed below which are federally enforceable.

- (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Misc. metal parts paint spray booth with disposable paper filters to control fugitive particulate matter emissions	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11	0.551 lb/hr of particulate matter
	OAC rule 3745-21-07(G)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b below.
	OAC rule 3745-31-05 (PTI 16-1550)	0.5 lb/hr of organic compounds 0.1 lb/hr of nitric acid (HNO3)

**2. Additional Terms and Conditions**

- (a) The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit. The total annual hazardous air pollutant (HAP) emissions from this facility shall not exceed 20.2 tons per year, and the individual HAP emissions rate shall not exceed 9.9 tons per year. To ensure these limits are met, Aircraft Braking System Corporation is committing to meet the operational restrictions listed in Section B of this permit.

**B. Operational Restrictions**

- 1. The permittee shall operate the disposable paper filtration system when this emissions unit is in operation.
- 2. The maximum annual coating usage for this facility shall not exceed 5,980 gallons, based on a rolling, 365-day summation of coating usage.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s) Maximum Allowable Cumulative Facility-wide Coating Usage (gallons)

- 1 500
- 1-2 1000
- 1-3 1500
- 1-4 2000
- 1-5 2500
- 1-6 3000
- 1-7 3500
- 1-8 4000
- 1-9 4500
- 1-10 5000
- 1-11 5500
- 1-12 5980

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 365-day summation of the coating usage.

- 3. Each coating employed in this emissions unit shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.
- 4. Cleanup solvents used shall contain no hazardous air pollutants.

**C. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall collect and record the following information each day for the coating line:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the volume, in gallons, of each coating and cleanup material employed;
  - c. the total volume, in gallons, of all of the coatings and cleanup materials employed; and
  - d. whether the coating and cleanup materials are photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5).
  - e. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 365-day summation of the coating usage.
- 2. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the facility-wide cumulative coating usage for each calendar month.

3. Beginning after the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, 365-day summation of the coating usage on a facility-wide basis.
  4. The permittee shall maintain a record of whether or not the disposable paper filtration system was in service when the emissions unit was in operation.
  5. The permittee shall collect and record the following information for each month for the coating operation:
    - a. the company identification for each coating and cleanup material employed;
    - b. the number of gallons of each coating and cleanup material employed;
    - c. the organic compound and HNO<sub>3</sub> content of each coating and cleanup material, in pounds per gallon;
    - d. the total organic compound and HNO<sub>3</sub> emission rates for all coatings and cleanup materials, in pounds per month;
    - e. the total number of hours the emissions unit was in operation;
    - f. the average hourly organic compound and HNO<sub>3</sub> emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average);
    - g. the total HAP content of each coating, as employed, in pounds per gallon of coating;
    - h. the name and content of each individual HAP of each coating, as employed, in pounds per gallon;
    - i. the name and identification of each cleanup solvent employed; and
    - j. the total HAP content of each cleanup solvent employed, in pounds per gallon.
- D. Reporting Requirements**
1. The permittee shall submit deviation (excursion) reports which include an identification of each day during which any photochemically reactive coatings and/or materials were employed, and the actual average daily organic compound emissions for each such day.
  2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the disposable paper filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 45 days after the event occurs.
  3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day facility-wide coating usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide coating usage levels.
  4. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.
  5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the coating line employed any coating with an individual HAP content or total HAP content greater than the applicable maximum HAP contents specified in Section B.4 of this permit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
  6. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the coating line employs any cleanup solvent that contains any of the 188 Hazardous Air Pollutants. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
  7. The permittee shall submit annual reports which specify the total coating usage, the individual HAP emissions, and the total HAP emissions for this emissions unit and the individual HAP emissions and the total HAP emissions for the entire facility for the previous calendar year. These reports shall include the emission calculations and shall be submitted by February 15 of each year.
- E. Testing Requirements**
1. Compliance with the emission limitations and the operational restriction in Sections A.1, A.2, and B of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
20% opacity as a 6-minute average  
Applicable Compliance Method:  
OAC rule 3745-17-03(B)(1)  
Emission Limitation:  
0.551 lb/hr of particulate matter  
Applicable Compliance Method:  
To determine the actual worst case particulate emissions rate, the following equation shall be used:  
$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$
  
$$E = \text{particulate emissions rate (lbs/hr)}$$
  
$$TE = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the}$$

amount of coating solids used

CE = fractional control efficiency of the control equipment

If required, emission testing shall be performed in accordance with the procedures in 40 CFR Part 60, Appendix A, Method 5.

Operational Restriction:

use of no photochemically reactive materials

Applicable Compliance Method:

Daily records shall be maintained of the daily usage of all coatings employed.

Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 5,980 gallons, based on a rolling, 365-day summation of coating usage.

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all coatings employed in the individual coating lines. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

Operational Restriction:

Coatings employed shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.

Applicable Compliance Method:

Formulation data shall be used to determine the hazardous air pollutant content of each coating employed.

Operational Restriction:

Cleanup solvents used shall contain no hazardous air pollutants.

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all cleanup solvents employed in the individual coating lines. Formulation data shall be used to determine the hazardous air pollutant content of each solvent employed.

Emission Limitation:

0.5 lb/hr of organic compounds

Applicable Compliance Method:

Monthly records shall be maintained of the organic compound content of each coating and cleanup material employed, the monthly usage of each coating and cleanup material employed, and the calculated average hourly organic compound emission rate for all coatings and cleanup materials employed. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of each coating and cleanup material.

Emission Limitation:

0.1 lb/hr of HNO<sub>3</sub>

Applicable Compliance Method:

Monthly records shall be maintained of the HNO<sub>3</sub> content of each coating and cleanup material employed, the monthly usage of each coating and cleanup material employed, and the calculated average hourly HNO<sub>3</sub> emission rate for all coatings and cleanup materials employed. Formulation data shall be used to determine the HNO<sub>3</sub> content of each coating and cleanup material.

**F. Miscellaneous Requirements**

1. Sections A, B, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.