State of Ohio Environmental Protection Agency

STREET ADDRESS:
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50 W. Town St., Suite 700
Columbus, Ohio 43215

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www.epa.state.oh.us

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

Certified Mail

7/29/2008

No	TOXIC REVIEW
No	PSD
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No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Scott Etter
JLG Industries Inc
600 East Chestnut Street
Orrville, OH 44667

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0285010292
Permit Number: P0086441
Permit Type: Renewal
County: Wayne

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Daily Recorder. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page http://www.epa.state.oh.us/dapc in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA-NEDO; Canada

FEDERALLY ENFORCEABLE STATE OPERATING PERMITS
SYNTHETIC MINOR DETERMINATION

JLG Industries, Inc
02-85-03-0292

Source Description

JLG Industries is a manufacturer of lifts and aerial work platforms. The facility is located in Orrville, Wayne County. Wayne County is attainment for all criteria pollutants.

Facility Emissions and Attainment Status

The facility is a major source according to Title V for VOC and a minor source for all other pollutants. Actual VOC emissions are approximately 25 tons per year and actual single and combined HAP emissions are approximately 0.66 tons per year .

Listed below is a chart of the potential emissions from each emissions unit and the facility in tons per year:

Pollutant	K001	K002	K003	K004	Sum
VOC	38.7	38.7	54.4	54.4	186.2
PM 10	0.70	0.70	2.44	1.72	4.86
HAP	1.18	0.88	1.62	1.22	4.90
Combine HAP	1.18	0.88	1.62	1.22	4.90

Emission Limitations

The facility is requesting federally enforceable limitations on VOC to avoid Title V permitting and on HAP emissions to ensure that the facility will not exceed the Miscellaneous Metal Part Coating MACT thresholds. The permit limits the total VOC emission from K001, K002, K003 and K004, combined to 99.9 tons per year, as a rolling, 12-month summation. The facility is required to keep rolling, 12-month VOC emission records from K001, K002, K003 and K004, combined and submit quarterly deviation reports. The permit limits the single HAP emission from K001, K002, K003 and K004, combined to 9.9 tons per year, as a rolling, 12-month summation and combined HAP emission from K001, K002, K003 and K004, combined to 24.9 tons per year, as a rolling, 12-month summation.

Listed below is a chart of the potential emissions from each emissions unit and the facility in tons per year including the federally enforceable limitations in this permit:

Pollutant	K001	K002	K003	K004	K001-K004 Fed. Enforceable Limit	Facility-wide PTE
VOC	38.7	38.7	54.4	54.4	99.9	99.9
PM 10	0.70	0.70	2.44	1.72		4.86
HAP	1.18	0.88	1.62	1.22	9.9	9.9

Combine HAP	1.18	0.88	1.62	1.22	24.9	9.9

Conclusion

The emission limits contained in these FESOPs are adequate to provide federally enforceable limitations for VOC, single HAP and combined HAPs. The limitations and associate monitoring, record keeping and reporting requirements in this permit ensure that the applicable Title V thresholds and the Miscellaneous Metal Part Coating MACT will not be exceeded.

Wayne County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
JLG Industries Inc

Issue Date: 7/29/2008
Permit Number: P0086441
Permit Type: Renewal
Permit Description: FEPTIO to impart Federally Enforceable limits on VOC and HAPs.
Facility ID: 0285010292
Facility Location: JLG Industries Inc
600 East Chestnut Street,
Orrville, OH 44667
Facility Description: Construction Machinery Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Edward Fasko at Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road or (330)425-9171. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

Air Pollution Permit-to-Install and Operate

for

JLG Industries Inc

Facility ID: 0285010292
Permit Number: P0086441
Permit Type: Renewal
Issued: 7/29/2008
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate

for

JLG Industries Inc

Table of Contents

Authorization

Facility ID: 0285010292
Application Number(s): A0017181
Permit Number: P0086441
Permit Description: FEPTIO to impart Federally Enforceable limits on VOC and HAPs.
Permit Type: Renewal
Permit Fee: $0.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 7/29/2008
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

JLG Industries Inc
600 East Chestnut Street
Orrville, OH 44667

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0086441
Permit Description: FEPTIO to impart Federally Enforceable limits on VOC and HAPs.

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

Emissions Unit ID:	**K001**
Company Equipment ID:	Batch Booth 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Batch Booth 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K003**
Company Equipment ID:	Primer Spray Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K004**
Company Equipment ID:	Top Coat Spray Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.
You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

(1) None.

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

(1) None.

C. Emissions Unit Terms and Conditions

1. **K001, Batch Booth 1**

Operations, Property and/or Equipment Description:

Metal axle and carriage coating operation with one HVLP manual spray gun in a booth with dry overspray filters.

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

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

a. 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. c)(5) and d)(7)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-21780 Effective 3/2/2006)	Volatile organic compound (VOC) emissions shall not exceed 8.8 pounds per hour as a daily average from coatings, and 38.7 tons per year from both coatings and cleanup materials. Particulate emissions (PE) shall not exceed 0.551 pound per hour and 2.4 tons per year from coatings. See c)(5) below. The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(1) and OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-21-09(U)(1)	See b)(2)a below.
c.	OAC rule 3745-17-07(A)(1)	See b)(2)b below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(C)	See b)(2)c below.
e.	OAC rule 3745-31-05(D)	See b)(2)d, b)(2)e, c)(3) and c)(4) below.
f.	40 CFR Part 63, Subpart XXXXXX	See b)(2)f below.

(2) Additional Terms and Conditions

a. The VOC content of the coatings employed shall not exceed a daily, volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

b. Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as specified by the rule.

c. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

d. The VOC emissions from all VOC-containing material employed in this emissions unit and in emissions units K001, K002, K003 and K004, combined, shall not exceed 99.9 tons per rolling, 12-month period.

e. The hazardous air pollutants from all HAP-containing material employed in this emissions unit and in emissions units K001, K002, K003 and K004, combined, shall not exceed 9.9 tons of each single HAP per rolling, 12-month period and 24.9 tons of combined HAP per rolling, 12-month period.

f. On April 3, 2008, U.S. EPA proposed the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Source Standards for 9 Metal Fabrication and Finishing Source Categories, 40 CFR Part 63 Subpart XXXXXX and Subpart A, General Provisions. When the NESHAP is promulgated, the facility will be subject as an existing area source with a compliance date as specified in the NESHAP.

c) Operational Restrictions

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

(2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

(3) The maximum coating usage for this emissions unit and from emissions units K001, K002, K003 and K004, combined, shall not cause emissions to exceed 99.9 tons of VOC per rolling 12 months.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the VOC coating usage, upon issuance of this permit.

(4) The maximum coating usage for this emissions unit and from emissions units K001, K002, K003 and K004, combined, shall not cause emissions to exceed 9.9 tons of each single HAP per rolling, 12-month period and 24.9 tons of combined HAP per rolling, 12-month period.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the VOC coating usage, upon issuance of this permit.

(5) Prior to the use of any coating in this coating line, the permittee shall determine that the coating meets the toxic screening criteria described below.

Purpose: The purpose of this test is to evaluate coatings to determine if the chemical compounds in the coatings would be emitted at acceptable levels for the general permit.

Data Needed: (1) MSDS sheet for each coating to be evaluated. (2) information on the maximum coating usage rate for the line as discussed in Step 1 below.

Step 1. Using the following factors, calculate the maximum coating usage rate in terms of gallons per hour:

a. Assume the coating line operates at its maximum speed while still making usable product.

b. Assume the coating line is operating at its largest coating laydown rate. This would typically be accomplished by assuming the coating line is painting the largest part available.

Step 2. Review the material safety data sheet (MSDS) for the coating. Note each chemical compound listed, its TLV and the percent by weight of the chemical compound in the coating.

Step 3. Determine if any of the chemical compounds listed in the MSDS are also listed in the table in Step 3 of the PTI. If any of the chemical compounds are listed in the table, then calculate the maximum annual emission of that compound by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. Then multiply the result by 8760 hours per year. The result will be in pounds per year.

Check to see if the calculated emission rate is less than the allowable emission rate found in the table in Step 3 of the PTI. If all of the compounds emitted have a maximum annual emission of less than the allowed rate, then move on to step 4. If any of the compounds are emitted at a rate higher than the allowed emission rate, then contact your appropriate District Office or local air agency contact to determine if you can use the coating.

Step 4. Find all of the chemical compounds in the MSDS that are listed in OAC rule 3745-114. For each chemical compounds listed in OAC rule 3745-114 (other than those in the above table), calculate the maximum short-term emission rate by multiplying the

maximum coating usage rate times the percent by weight of each chemical compound. The result should be in terms of pounds of the chemical compound per hour.

Step 5. Determine if the compound will be emitted at or below the acceptable rate. This is done by determining each compound's American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Value (TLV), searching the table in Step 5 of the PTI for the chemical compound's TLV and then determining the maximum allowed emission rate listed in the below table. (Note. If the TLV is listed as ppm, then convert the TLV to :g/m3 by using the following formula: (TLV in ppm)x(MW)x(1000)/24.45 = TLV in :g/m3; where MW is the molecular weight of the compound.) This table lists the allowable emission rates for compounds with a TLV between the high range and low range. Compare the maximum calculated short-term emission rate of each chemical compound to the allowed emission rate in the table. If the maximum emission rate is less than the allowed emission rate, then the chemical compound is emitted at an acceptable rate.

Step 6. Check each chemical compound that is listed in OAC rule 3745-114. If all compounds are emitted at a rate less than the allowed emission rate, then the coating passes the toxic screening test and can be used under this permit. If one or more of the chemical compounds are emitted at a rate greater than the allowed emission rate, then you should contact your appropriate District Office or local air agency contact to determine if you can use the coating.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee.

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

In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee

(2) 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 VOC content (excluding water and exempt solvents) of each coating, as applied;

c. the number of gallons (excluding water and exempt solvents) of each coating, as applied;

d. the daily VOC emissions from all the coatings employed, in pounds, [i.e., the sum of (b) times (c) for each coating employed];

e. the daily volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2;

f. the total number of hours this emissions unit was in operation; and

g. the average hourly VOC emissions from all coatings employed, in pounds [i.e., the quotient of (d) divided by (f)].

Note: If the VOC content of each of the coatings employed during a day is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

(3) The permittee shall collect and record the following information for each month for this emissions unit:

a. the company identification of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the VOC content of each cleanup material employed, in pounds per gallon;

d. the total VOC emissions from all the cleanup materials employed, in pounds [i.e., the sum of (b) x (c) for each cleanup material employed]

e. the amount of cleanup material recovered, in pounds; and

f. the total monthly VOC emissions from cleanup operations, in pounds [i.e., (d) - (e)].

(4) The permittee shall collect and record the following information for each month for the emissions unit to demonstrate compliance with the synthetic minor operational restrictions:

a. the actual VOC emissions from all coatings and cleanup materials for the previous, 12-month period [i.e., sum of the daily VOC emissions in d)(2)d and the monthly cleanup material VOC emissions in d)(3)f for the previous, 12-month period]; and

b. the actual VOC emissions from K001, K002, K003 and K004, combined, for the previous, 12-month period.

(5) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP) that are applied in emissions units K001, K002, K003 and K004, combined:

a. the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;

b. the name/identification of each individual HAP contained in each material applied, recorded in "a" above, and the corresponding pound of each HAP per gallon of each HAP-containing material applied;

c. the number of gallons of each coating, thinner, additive, and cleanup material applied during the month, identified in "a" above;

d. for each individual HAP, the total emissions from all the materials employed containing the HAP, in tons, i.e., for each individual HAP, the summation of the products of ("b" times "c") for all the materials applied during the month containing each individual HAP, divided by 2,000 pounds;

e. the total combined HAPs emissions from all the HAP-containing materials applied during the month, in tons, i.e., the summation of all the individual HAPs emissions from "d" above;

f. for each individual HAP, the total individual HAP emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in "d" above, from the present month plus the previous 11 months of operation, in tons; and

g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in "e" above, from the present month plus the previous 11 months of operation, in tons.

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

(6) All records and operations logs required by this permit shall be maintain for not less than five years and shall be made available to the Ohio EPA Northeast District Office upon request.

(7) The permittee shall collect and record the results of any toxic screening evaluations done per c)(5).

e) Reporting Requirements

(1) The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of each daily record showing a daily volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

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

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the rolling, 12-month VOC emission limitation from all the VOC-containing materials employed in emissions units K001, K002, K003 and K004, combined;

ii. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP from all the HAP-containing materials employed in emissions units K001, K002, K003 and K004, combined; and

iii. all exceedances of the rolling, 12-month total combined HAPs emission limitation from all the HAP-containing materials employed in emissions units K001, K002, K003 and K004, combined.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the Ohio EPA Northeast District Office).

(3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC content of the coating shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents,daily volume-weighted average.

Applicable Compliance Method:

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

b. Emission Limitation:

VOC emissions shall not exceed 8.8 lbs/hr, as a daily average.

Applicable Compliance Method:

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

c. Emission Limitation:

VOC emissions shall not exceed 38.7 tons per year.

Applicable Compliance Method:

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

d. Emission Limitation:

VOC emissions from all VOC-containing material employed in this emissions unit and in emissions units K001, K002, K003 and K004, combined, shall not exceed 99.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by the value recorded in d)(4) based on the record keeping requirements specified in d)(2) and d)(3).

e. Emission Limitation:

Particulate emissions shall not exceed 0.551 lb per hour.

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

E = maximum coating solids usage rate, in pounds per hour, x (1-TE) x (1-CE)

where:

E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emission limitation pursuant to OAC rule 3745-17-03(B)(10).

f. Emission Limitation:

Particulate emissions shall not exceed 2.41 tons per year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.551 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

g. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as specified by the rule.

Applicable Compliance Method:

When requested by the Ohio EPA, compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

h. Emission Limitation:

The hazardous air pollutants from all HAP-containing material employed in this emissions unit and in emissions units K001, K002, K003 and K004, combined, shall not exceed 9.9 tons of each single HAP per rolling, 12-month period and 24.9 tons of combined HAP per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in d)(5).

(2) USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

g) Miscellaneous Requirements

(1) None.

2. **K002, Batch Booth 2**

Operations, Property and/or Equipment Description:

Metal axle and carriage coating opertion with one HVLP manual spray gun in a booth with dry overspray filters.

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

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

a. 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. c)(5) and d)(7)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-21780 Effective 3/2/2006)	Volatile organic compound (VOC) emissions shall not exceed 8.8 pounds per hour as a daily average from coatings, and 38.7 tons per year from both coatings and cleanup materials. Particulate emissions (PE) shall not exceed 0.551 pound per hour and 2.4 tons per year from coatings. See c)(5) below. The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(1) and OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-21-09(U)(1)	See b)(2)a below.
c.	OAC rule 3745-17-07(A)(1)	See b)(2)b below.
d.	OAC rule 3745-17-11(C)	See b)(2)c below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-31-05(D)	See b)(2)d, b)(2)e, c)(3) and c)(4) below.
f.	40 CFR Part 63, Subpart XXXXXX	See b)(2)f below.

(2) Additional Terms and Conditions

a. The VOC content of the coatings employed shall not exceed a daily, volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

b. Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as specified by the rule.

c. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

d. The VOC emissions from all VOC-containing material employed in this emissions unit and in emissions units K001, K002, K003 and K004, combined, shall not exceed 99.9 tons per rolling, 12-month period.

e. The hazardous air pollutants from all HAP-containing material employed in this emissions unit and in emissions units K001, K002, K003 and K004, combined, shall not exceed 9.9 tons of each single HAP per rolling, 12-month period and 24.9 tons of combined HAP per rolling, 12-month period.

f. On April 3, 2008, U.S. EPA proposed the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Source Standards for 9 Metal Fabrication and Finishing Source Categories, 40 CFR Part 63 Subpart XXXXXX and Subpart A, General Provisions. When the NESHAP is promulgated, the facility will be subject as an existing area source with a compliance date as specified in the NESHAP.

c) Operational Restrictions

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

(2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

(3) The maximum coating usage for this emissions unit and from emissions units K001, K002, K003 and K004, combined, shall not cause emissions to exceed 99.9 tons of VOC per rolling 12 months.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the VOC coating usage, upon issuance of this permit.

(4) The maximum coating usage for this emissions unit and from emissions units K001, K002, K003 and K004, combined, shall not cause emissions to exceed 9.9 tons of each single HAP per rolling, 12-month period and 24.9 tons of combined HAP per rolling, 12-month period.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the VOC coating usage, upon issuance of this permit.

(5) Prior to the use of any coating in this coating line, the permittee shall determine that the coating meets the toxic screening criteria described below.

Purpose: The purpose of this test is to evaluate coatings to determine if the chemical compounds in the coatings would be emitted at acceptable levels for the general permit.

Data Needed: (1) MSDS sheet for each coating to be evaluated. (2) information on the maximum coating usage rate for the line as discussed in Step 1 below.

Step 1. Using the following factors, calculate the maximum coating usage rate in terms of gallons per hour:

a. Assume the coating line operates at its maximum speed while still making usable product.

b. Assume the coating line is operating at its largest coating laydown rate. This would typically be accomplished by assuming the coating line is painting the largest part available.

Step 2. Review the material safety data sheet (MSDS) for the coating. Note each chemical compound listed, its TLV and the percent by weight of the chemical compound in the coating.

Step 3. Determine if any of the chemical compounds listed in the MSDS are also listed in the table in Step 3 of the PTI. If any of the chemical compounds are listed in the table, then calculate the maximum annual emission of that compound by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. Then multiply the result by 8760 hours per year. The result will be in pounds per year.

Check to see if the calculated emission rate is less than the allowable emission rate found in the table in Step 3 of the PTI. If all of the compounds emitted have a maximum annual emission of less than the allowed rate, then move on to step 4. If any of the compounds are emitted at a rate higher than the allowed emission rate, then contact your appropriate District Office or local air agency contact to determine if you can use the coating.

Step 4. Find all of the chemical compounds in the MSDS that are listed in OAC rule 3745-114. For each chemical compounds listed in OAC rule 3745-114 (other than those in the above table), calculate the maximum short-term emission rate by multiplying the

maximum coating usage rate times the percent by weight of each chemical compound. The result should be in terms of pounds of the chemical compound per hour.

Step 5. Determine if the compound will be emitted at or below the acceptable rate. This is done by determining each compound's American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Value (TLV), searching the table in Step 5 of the PTI for the chemical compound's TLV and then determining the maximum allowed emission rate listed in the below table. (Note. If the TLV is listed as ppm, then convert the TLV to :g/m3 by using the following formula: (TLV in ppm)x(MW)x(1000)/24.45 = TLV in :g/m3; where MW is the molecular weight of the compound.) This table lists the allowable emission rates for compounds with a TLV between the high range and low range. Compare the maximum calculated short-term emission rate of each chemical compound to the allowed emission rate in the table. If the maximum emission rate is less than the allowed emission rate, then the chemical compound is emitted at an acceptable rate.

Step 6. Check each chemical compound that is listed in OAC rule 3745-114. If all compounds are emitted at a rate less than the allowed emission rate, then the coating passes the toxic screening test and can be used under this permit. If one or more of the chemical compounds are emitted at a rate greater than the allowed emission rate, then you should contact your appropriate District Office or local air agency contact to determine if you can use the coating.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee.

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

In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee

(2) 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 VOC content (excluding water and exempt solvents) of each coating, as applied;

c. the number of gallons (excluding water and exempt solvents) of each coating, as applied;

d. the daily VOC emissions from all the coatings employed, in pounds, [i.e., the sum of (b) times (c) for each coating employed];

e. the daily volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2;

f. the total number of hours this emissions unit was in operation; and

g. the average hourly VOC emissions from all coatings employed, in pounds [i.e., the quotient of (d) divided by (f)].

Note: If the VOC content of each of the coatings employed during a day is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

(3) The permittee shall collect and record the following information for each month for this emissions unit:

a. the company identification of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the VOC content of each cleanup material employed, in pounds per gallon;

d. the total VOC emissions from all the cleanup materials employed, in pounds [i.e., the sum of (b) x (c) for each cleanup material employed]

e. the amount of cleanup material recovered, in pounds; and

f. the total monthly VOC emissions from cleanup operations, in pounds [i.e., (d) - (e)].

(4) The permittee shall collect and record the following information for each month for the emissions unit to demonstrate compliance with the synthetic minor operational restrictions:

a. the actual VOC emissions from all coatings and cleanup materials for the previous, 12-month period [i.e., sum of the daily VOC emissions in d)(2)d and the monthly cleanup material VOC emissions in d)(3)f for the previous, 12-month period]; and

b. the actual VOC emissions from K001, K002, K003 and K004, combined, for the previous, 12-month period.

(5) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP) that are applied in emissions units K001, K002, K003 and K004, combined:

a. the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;

b. the name/identification of each individual HAP contained in each material applied, recorded in "a" above, and the corresponding pound of each HAP per gallon of each HAP-containing material applied;

c. the number of gallons of each coating, thinner, additive, and cleanup material applied during the month, identified in "a" above;

d. for each individual HAP, the total emissions from all the materials employed containing the HAP, in tons, i.e., for each individual HAP, the summation of the products of ("b" times "c") for all the materials applied during the month containing each individual HAP, divided by 2,000 pounds;

e. the total combined HAPs emissions from all the HAP-containing materials applied during the month, in tons, i.e., the summation of all the individual HAPs emissions from "d" above;

f. for each individual HAP, the total individual HAP emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in "d" above, from the present month plus the previous 11 months of operation, in tons; and

g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in "e" above, from the present month plus the previous 11 months of operation, in tons.

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

(6) All records and operations logs required by this permit shall be maintain for not less than five years and shall be made available to the Ohio EPA Northeast District Office upon request.

(7) The permittee shall collect and record the results of any toxic screening evaluations done per c)(5).

e) Reporting Requirements

(1) The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of each daily record showing a daily volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

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

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the rolling, 12-month VOC emission limitation from all the VOC-containing materials employed in emissions units K001, K002, K003 and K004, combined;

ii. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP from all the HAP-containing materials employed in emissions units K001, K002, K003 and K004, combined; and

iii. all exceedances of the rolling, 12-month total combined HAPs emission limitation from all the HAP-containing materials employed in emissions units K001, K002, K003 and K004, combined.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the Ohio EPA Northeast District Office).

(3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC content of the coating shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents,daily volume-weighted average.

Applicable Compliance Method:

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

b. Emission Limitation:

VOC emissions shall not exceed 8.8 lbs/hr, as a daily average.

Applicable Compliance Method:

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

c. Emission Limitation:

VOC emissions shall not exceed 38.7 tons per year.

Applicable Compliance Method:

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

d. Emission Limitation:

VOC emissions from all VOC-containing material employed in this emissions unit and in emissions units K001, K002, K003 and K004, combined, shall not exceed 99.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by the value recorded in d)(4) based on the record keeping requirements specified in d)(2) and d)(3).

e. Emission Limitation:

Particulate emissions shall not exceed 0.551 lb per hour.

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

E = maximum coating solids usage rate, in pounds per hour, x (1-TE) x (1-CE)

where:

E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emission limitation pursuant to OAC rule 3745-17-03(B)(10).

f. Emission Limitation:

Particulate emissions shall not exceed 2.41 tons per year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.551 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

g. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as specified by the rule.

Applicable Compliance Method:

When requested by the Ohio EPA, compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

h. Emission Limitation:

The hazardous air pollutants from all HAP-containing material employed in this emissions unit and in emissions units K001, K002, K003 and K004, combined, shall not exceed 9.9 tons of each single HAP per rolling, 12-month period and 24.9 tons of combined HAP per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in d)(5).

(2) USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

g) Miscellaneous Requirements

(1) None.

3. **K003, Primer Spray Booth**

Operations, Property and/or Equipment Description:

Miscellaneous metal primer spray booth with associated drying oven

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

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

a. 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. c)(5) and d)(7)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-22311 Effective 10/3/2006)	Volatile organic compound (VOC) emissions shall not exceed 12.3 pounds per hour as a daily average from coatings, and 54.4 tons per year from both coatings and cleanup materials. Particulate emissions (PE) shall not exceed 0.551 pound per hour and 2.4 tons per year from coatings. See c)(5) below The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(1) and OAC rule 3745-17-07(A)(1).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-21-09(U)(1)	See b)(2)a below.
c.	OAC rule 3745-17-07(A)(1)	See b)(2)b below.
d.	OAC rule 3745-17-11(C)	See b)(2)c below.
e.	OAC rule 3745-31-05(D)	See b)(2)d, b)(2)e, c)(3) and c)(4) below.
f.	40 CFR Part 63, Subpart XXXXXX	See b)(2)f below.

(2) Additional Terms and Conditions

a. The VOC content of the coatings employed shall not exceed a daily, volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

b. Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as specified by the rule.

c. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

d. The VOC emissions from all VOC-containing material employed in this emissions unit and in emissions units K001, K002, K003 and K004, combined, shall not exceed 99.9 tons per rolling, 12-month period.

e. The hazardous air pollutants from all HAP-containing material employed in this emissions unit and in emissions units K001, K002, K003 and K004, combined, shall not exceed 9.9 tons of each single HAP per rolling, 12-month period and 24.9 tons of combined HAP per rolling, 12-month period.

f. On April 3, 2008, U.S. EPA proposed the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Source Standards for 9 Metal Fabrication and Finishing Source Categories, 40 CFR Part 63 Subpart XXXXXX and Subpart A, General Provisions. When the NESHAP is promulgated, the facility will be subject as an existing area source with a compliance date as specified in the NESHAP.

c) Operational Restrictions

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

(2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

(3) The maximum coating usage for this emissions unit and from emissions units K001, K002, K003 and K004, combined, shall not cause emissions to exceed 99.9 tons of VOC per rolling 12 months.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the VOC coating usage, upon issuance of this permit.

(4) The maximum coating usage for this emissions unit and from emissions units K001, K002, K003 and K004, combined, shall not cause emissions to exceed 9.9 tons of each single HAP per rolling, 12-month period and 24.9 tons of combined HAP per rolling, 12-month period.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the VOC coating usage, upon issuance of this permit.

(5) Prior to the use of any coating in this coating line, the permittee shall determine that the coating meets the toxic screening criteria described below.

Purpose: The purpose of this test is to evaluate coatings to determine if the chemical compounds in the coatings would be emitted at acceptable levels for the general permit.

Data Needed: (1) MSDS sheet for each coating to be evaluated. (2) information on the maximum coating usage rate for the line as discussed in Step 1 below.

Step 1. Using the following factors, calculate the maximum coating usage rate in terms of gallons per hour:

a. Assume the coating line operates at its maximum speed while still making usable product.

b. Assume the coating line is operating at its largest coating laydown rate. This would typically be accomplished by assuming the coating line is painting the largest part available.

Step 2. Review the material safety data sheet (MSDS) for the coating. Note each chemical compound listed, its TLV and the percent by weight of the chemical compound in the coating.

Step 3. Determine if any of the chemical compounds listed in the MSDS are also listed in the table in Step 3 of the PTI. If any of the chemical compounds are listed in the table, then calculate the maximum annual emission of that compound by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. Then multiply the result by 8760 hours per year. The result will be in pounds per year.

Check to see if the calculated emission rate is less than the allowable emission rate found in the table in Step 3 of the PTI. If all of the compounds emitted have a maximum annual emission of less than the allowed rate, then move on to step 4. If any of the compounds are emitted at a rate higher than the allowed emission rate, then contact your appropriate District Office or local air agency contact to determine if you can use the coating.

Step 4. Find all of the chemical compounds in the MSDS that are listed in OAC rule 3745-114. For each chemical compounds listed in OAC rule 3745-114 (other than those in the above table), calculate the maximum short-term emission rate by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. The result should be in terms of pounds of the chemical compound per hour.

Step 5. Determine if the compound will be emitted at or below the acceptable rate. This is done by determining each compound's American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Value (TLV), searching the table in Step 5 of the PTI for the chemical compound's TLV and then determining the maximum allowed emission rate listed in the below table. (Note. If the TLV is listed as ppm, then convert the TLV to :g/m3 by using the following formula: (TLV in ppm)x(MW)x(1000)/24.45 = TLV in :g/m3; where MW is the molecular weight of the compound.) This table lists the allowable emission rates for compounds with a TLV between the high range and low range. Compare the maximum calculated short-term emission rate of each chemical compound to the allowed emission rate in the table. If the maximum emission rate is less than the allowed emission rate, then the chemical compound is emitted at an acceptable rate.

Step 6. Check each chemical compound that is listed in OAC rule 3745-114. If all compounds are emitted at a rate less than the allowed emission rate, then the coating passes the toxic screening test and can be used under this permit. If one or more of the chemical compounds are emitted at a rate greater than the allowed emission rate, then you should contact your appropriate District Office or local air agency contact to determine if you can use the coating.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee.

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

In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee

(2) 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 VOC content (excluding water and exempt solvents) of each coating, as applied;

c. the number of gallons (excluding water and exempt solvents) of each coating, as applied;

d. the daily VOC emissions from all the coatings employed, in pounds, [i.e., the sum of (b) times (c) for each coating employed];

e. the daily volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2;

f. the total number of hours this emissions unit was in operation; and

g. the average hourly VOC emissions from all coatings employed, in pounds [i.e., the quotient of (d) divided by (f)].

Note: If the VOC content of each of the coatings employed during a day is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

(3) The permittee shall collect and record the following information for each month for this emissions unit:

a. the company identification of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the VOC content of each cleanup material employed, in pounds per gallon;

d. the total VOC emissions from all the cleanup materials employed, in pounds [i.e., the sum of (b) x (c) for each cleanup material employed]

e. the amount of cleanup material recovered, in pounds; and

f. the total monthly VOC emissions from cleanup operations, in pounds [i.e., (d) - (e)].

(4) The permittee shall collect and record the following information for each month for the emissions unit to demonstrate compliance with the synthetic minor operational restrictions:

a. the actual VOC emissions from all coatings and cleanup materials for the previous, 12-month period [i.e., sum of the daily VOC emissions in d)(2)d and the monthly cleanup material VOC emissions in d)(3)f for the previous, 12-month period]; and

b. the actual VOC emissions from K001, K002, K003 and K004, combined, for the previous, 12-month period.

(5) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP) that are applied in emissions units K001, K002, K003 and K004, combined:

a. the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;

b. the name/identification of each individual HAP contained in each material applied, recorded in "a" above, and the corresponding pound of each HAP per gallon of each HAP-containing material applied;

c. the number of gallons of each coating, thinner, additive, and cleanup material applied during the month, identified in "a" above;

d. for each individual HAP, the total emissions from all the materials employed containing the HAP, in tons, i.e., for each individual HAP, the summation of the products of ("b" times "c") for all the materials applied during the month containing each individual HAP, divided by 2,000 pounds;

e. the total combined HAPs emissions from all the HAP-containing materials applied during the month, in tons, i.e., the summation of all the individual HAPs emissions from "d" above;

f. for each individual HAP, the total individual HAP emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in "d" above, from the present month plus the previous 11 months of operation, in tons; and

g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in "e" above, from the present month plus the previous 11 months of operation, in tons.

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

(6) All records and operations logs required by this permit shall be maintain for not less than five years and shall be made available to the Ohio EPA Northeast District Office upon request.

(7) The permittee shall collect and record the results of any toxic screening evaluations done per c)(5).

e) Reporting Requirements

(1) The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of each daily record showing a daily volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

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

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the rolling, 12-month VOC emission limitation from all the VOC-containing materials employed in emissions units K001, K002, K003 and K004, combined;

ii. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP from all the HAP-containing materials employed in emissions units K001, K002, K003 and K004, combined; and

iii. all exceedances of the rolling, 12-month total combined HAPs emission limitation from all the HAP-containing materials employed in emissions units K001, K002, K003 and K004, combined.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the Ohio EPA Northeast District Office).

(3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC content of the coating shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents,daily volume-weighted average.

Applicable Compliance Method:

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

b. Emission Limitation:

VOC emissions shall not exceed 12.3 lbs/hr, as a daily average.

Applicable Compliance Method:

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

c. Emission Limitation:

VOC emissions shall not exceed 55.4 tons per year.

Applicable Compliance Method:

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

d. Emission Limitation:

VOC emissions from all VOC-containing material employed in this emissions unit and in emissions units K001, K002, K003 and K004, combined, shall not exceed 99.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by the value recorded in d)(4) based on the record keeping requirements specified in d)(2) and d)(3).

e. Emission Limitation:

Particulate emissions shall not exceed 0.551 lb per hour.

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

E = maximum coating solids usage rate, in pounds per hour, x (1-TE) x (1-CE)

where:

E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emission limitation pursuant to OAC rule 3745-17-03(B)(10).

f. Emission Limitation:

Particulate emissions shall not exceed 2.41 tons per year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.551 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

g. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as specified by the rule.

Applicable Compliance Method:

When requested by the Ohio EPA, compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

h. Emission Limitation:

The hazardous air pollutants from all HAP-containing material employed in this emissions unit and in emissions units K001, K002, K003 and K004, combined, shall not exceed 9.9 tons of each single HAP per rolling, 12-month period and 24.9 tons of combined HAP per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in d)(5).

(2) USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

g) Miscellaneous Requirements

(1) None.

4. **K004, Top Coat Spray Booth**

Operations, Property and/or Equipment Description:

miscellaneous metal top coat spray booth with associated drying oven

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

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

a. 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. c)(5) and d)(7)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-22311 Effective 10/3/2006)	Volatile organic compound (VOC) emissions shall not exceed 12.3 pounds per hour as a daily average from coatings, and 54.4 tons per year from both coatings and cleanup materials. Particulate emissions (PE) shall not exceed 0.551 pound per hour and 2.4 tons per year from coatings. See c)(5) below. The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(1) and OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-21-09(U)(1)	See b)(2)a below.
c.	OAC rule 3745-17-07(A)(1)	See b)(2)b below.
d.	OAC rule 3745-17-11(C)	See b)(2)c below.

e.	OAC rule 3745-31-05(D)	See b)(2)d, b)(2)e, c)(3) and c)(4) below.
(2)	40 CFR Part 63, Subpart XXXXXX	See b)(2)f below.

Additional Terms and Conditions

a. The VOC content of the coatings employed shall not exceed a daily, volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

b. Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as specified by the rule.

c. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

d. The VOC emissions from all VOC-containing material employed in this emissions unit and in emissions units K001, K002, K003 and K004, combined, shall not exceed 99.9 tons per rolling, 12-month period.

e. The hazardous air pollutants from all HAP-containing material employed in this emissions unit and in emissions units K001, K002, K003 and K004, combined, shall not exceed 9.9 tons of each single HAP per rolling, 12-month period and 24.9 tons of combined HAP per rolling, 12-month period.

f. On April 3, 2008, U.S. EPA proposed the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Source Standards for 9 Metal Fabrication and Finishing Source Categories, 40 CFR Part 63 Subpart XXXXXX and Subpart A, General Provisions. When the NESHAP is promulgated, the facility will be subject as an existing area source with a compliance date as specified in the NESHAP.

c) Operational Restrictions

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

(2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

(3) The maximum coating usage for this emissions unit and from emissions units K001, K002, K003 and K004, combined, shall not cause emissions to exceed 99.9 tons of VOC per rolling 12 months.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the VOC coating usage, upon issuance of this permit.

(4) The maximum coating usage for this emissions unit and from emissions units K001, K002, K003 and K004, combined, shall not cause emissions to exceed 9.9 tons of each single HAP per rolling, 12-month period and 24.9 tons of combined HAP per rolling, 12-month period.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the VOC coating usage, upon issuance of this permit.

(5) Prior to the use of any coating in this coating line, the permittee shall determine that the coating meets the toxic screening criteria described below.

Purpose: The purpose of this test is to evaluate coatings to determine if the chemical compounds in the coatings would be emitted at acceptable levels for the general permit.

Data Needed: (1) MSDS sheet for each coating to be evaluated. (2) information on the maximum coating usage rate for the line as discussed in Step 1 below.

Step 1. Using the following factors, calculate the maximum coating usage rate in terms of gallons per hour:

a. Assume the coating line operates at its maximum speed while still making usable product.

b. Assume the coating line is operating at its largest coating laydown rate. This would typically be accomplished by assuming the coating line is painting the largest part available.

Step 2. Review the material safety data sheet (MSDS) for the coating. Note each chemical compound listed, its TLV and the percent by weight of the chemical compound in the coating.

Step 3. Determine if any of the chemical compounds listed in the MSDS are also listed in the table in Step 3 of the PTI. If any of the chemical compounds are listed in the table, then calculate the maximum annual emission of that compound by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. Then multiply the result by 8760 hours per year. The result will be in pounds per year.

Check to see if the calculated emission rate is less than the allowable emission rate found in the table in Step 3 of the PTI. If all of the compounds emitted have a maximum annual emission of less than the allowed rate, then move on to step 4. If any of the compounds are emitted at a rate higher than the allowed emission rate, then contact your appropriate District Office or local air agency contact to determine if you can use the coating.

Step 4. Find all of the chemical compounds in the MSDS that are listed in OAC rule 3745-114. For each chemical compounds listed in OAC rule 3745-114 (other than those in the above table), calculate the maximum short-term emission rate by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. The result should be in terms of pounds of the chemical compound per hour.

Step 5. Determine if the compound will be emitted at or below the acceptable rate. This is done by determining each compound's American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Value (TLV), searching the table in Step 5 of the PTI for the chemical compound's TLV and then determining the maximum allowed emission rate listed in the below table. (Note. If the TLV is listed as ppm, then convert the TLV to :g/m3 by using the following formula: (TLV in ppm)x(MW)x(1000)/24.45 = TLV in :g/m3; where MW is the molecular weight of the compound.) This table lists the allowable emission rates for compounds with a TLV between the high range and low range. Compare the maximum calculated short-term emission rate of each chemical compound to the allowed emission rate in the table. If the maximum emission rate is less than the allowed emission rate, then the chemical compound is emitted at an acceptable rate.

Step 6. Check each chemical compound that is listed in OAC rule 3745-114. If all compounds are emitted at a rate less than the allowed emission rate, then the coating passes the toxic screening test and can be used under this permit. If one or more of the chemical compounds are emitted at a rate greater than the allowed emission rate, then you should contact your appropriate District Office or local air agency contact to determine if you can use the coating.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee.

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

In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

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

according to the manufacturer's recommendations with any documented modifications made by the permittee

(2) 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 VOC content (excluding water and exempt solvents) of each coating, as applied;

c. the number of gallons (excluding water and exempt solvents) of each coating, as applied;

d. the daily VOC emissions from all the coatings employed, in pounds, [i.e., the sum of (b) times (c) for each coating employed];

e. the daily volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2;

f. the total number of hours this emissions unit was in operation; and

g. the average hourly VOC emissions from all coatings employed, in pounds [i.e., the quotient of (d) divided by (f)].

Note: If the VOC content of each of the coatings employed during a day is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

(3) The permittee shall collect and record the following information for each month for this emissions unit:

a. the company identification of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the VOC content of each cleanup material employed, in pounds per gallon;

d. the total VOC emissions from all the cleanup materials employed, in pounds [i.e., the sum of (b) x (c) for each cleanup material employed]

e. the amount of cleanup material recovered, in pounds; and

f. the total monthly VOC emissions from cleanup operations, in pounds [i.e., (d) - (e)].

(4) The permittee shall collect and record the following information for each month for the emissions unit to demonstrate compliance with the synthetic minor operational restrictions:

a. the actual VOC emissions from all coatings and cleanup materials for the previous, 12-month period [i.e., sum of the daily VOC emissions in d)(2)d and the

monthly cleanup material VOC emissions in d)(3)f for the previous, 12-month period]; and

b. the actual VOC emissions from K001, K002, K003 and K004, combined, for the previous, 12-month period.

(5) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP) that are applied in emissions units K001, K002, K003 and K004, combined:

a. the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;

b. the name/identification of each individual HAP contained in each material applied, recorded in "a" above, and the corresponding pound of each HAP per gallon of each HAP-containing material applied;

c. the number of gallons of each coating, thinner, additive, and cleanup material applied during the month, identified in "a" above;

d. for each individual HAP, the total emissions from all the materials employed containing the HAP, in tons, i.e., for each individual HAP, the summation of the products of ("b" times "c") for all the materials applied during the month containing each individual HAP, divided by 2,000 pounds;

e. the total combined HAPs emissions from all the HAP-containing materials applied during the month, in tons, i.e., the summation of all the individual HAPs emissions from "d" above;

f. for each individual HAP, the total individual HAP emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in "d" above, from the present month plus the previous 11 months of operation, in tons; and

g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in "e" above, from the present month plus the previous 11 months of operation, in tons.

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

(6) All records and operations logs required by this permit shall be maintain for not less than five years and shall be made available to the Ohio EPA Northeast District Office upon request.

(7) The permittee shall collect and record the results of any toxic screening evaluations done per c)(5).

e) Reporting Requirements

(1) The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of each daily record showing a daily volume-weighted average greater than 3.5 pounds

VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

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

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the rolling, 12-month VOC emission limitation from all the VOC-containing materials employed in emissions units K001, K002, K003 and K004, combined;

ii. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP from all the HAP-containing materials employed in emissions units K001, K002, K003 and K004, combined; and

iii. all exceedances of the rolling, 12-month total combined HAPs emission limitation from all the HAP-containing materials employed in emissions units K001, K002, K003 and K004, combined.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the Ohio EPA Northeast District Office).

(3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC content of the coating shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents, daily volume-weighted average.

Applicable Compliance Method:

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

b. Emission Limitation:

VOC emissions shall not exceed 12.3 lbs/hr, as a daily average.

Applicable Compliance Method:

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

c. Emission Limitation:

VOC emissions shall not exceed 55.4 tons per year.

Applicable Compliance Method:

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

d. Emission Limitation:

VOC emissions from all VOC-containing material employed in this emissions unit and in emissions units K001, K002, K003 and K004, combined, shall not exceed 99.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by the value recorded in d)(4) based on the record keeping requirements specified in d)(2) and d)(3).

e. Emission Limitation:

Particulate emissions shall not exceed 0.551 lb per hour.

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

E = maximum coating solids usage rate, in pounds per hour, x (1-TE) x (1-CE)

where:

E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emission limitation pursuant to OAC rule 3745-17-03(B)(10).

f. Emission Limitation:

Particulate emissions shall not exceed 2.41 tons per year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.551 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

g. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as specified by the rule.

Applicable Compliance Method:

When requested by the Ohio EPA, compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

h. Emission Limitation:

The hazardous air pollutants from all HAP-containing material employed in this emissions unit and in emissions units K001, K002, K003 and K004, combined, shall not exceed 9.9 tons of each single HAP per rolling, 12-month period and 24.9 tons of combined HAP per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in d)(5).

(2) USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

g) Miscellaneous Requirements

(1) None.