State of Ohio Environmental Protection Agency

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P.O. Box 1049
Columbus, OH 43216-1049

Certified Mail

8/18/2008

Yes	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Mr. Kevin Lozan
Florida Production Engineering
1855 STATE ROUTE 121 NORTH
New Madison, OH 45346

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0819100218
Permit Number: 08-04927
Permit Type: Initial Installation
County: Darke

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.state.oh.us/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of $70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Regional Air Pollution Control Agency. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern

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

Cc: RAPCA

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

Air Pollution Permit-to-Install and Operate
for
Florida Production Engineering

Facility ID:	0819100218
Permit Number:	08-04927
Permit Type:	Initial Installation
Issued:	8/18/2008
Effective:	8/18/2008
Expiration:	8/18/2013

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
Florida Production Engineering

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Authorization

Facility ID: 0819100218
Application Number(s): A0007720
Permit Number: 08-04927
Permit Description: Chapter 31 modification replacing PTI 08-02646 issued 6/1/93 and PTI 08-04088 issued 3/9/06 to establish new Synthetic Minor restrictions.
Permit Type: Initial Installation
Permit Fee: $400.00
Issue Date: 8/18/2008
Effective Date: 8/18/2008
Expiration Date: 8/18/2013
Permit Evaluation Report (PER) Annual Date: Feb 15, for Jan 1 - Dec 31
This document constitutes issuance to:

Florida Production Engineering
1855 STATE ROUTE 121 NORTH
New Madison, OH 12647

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:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

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: 08-04927
Permit Description: Chapter 31 modification replacing PTI 08-02646 issued 6/1/93 and PTI 08-04088 issued 3/9/06 to establish new Synthetic Minor restrictions.

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:	Quad paint line w/ thermal oxidizer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K003**
Company Equipment ID:	Cell 13 coating line w/ oxidizer
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 Regional Air Pollution Control Agency 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, Quad Paint Lines

Operations, Property and/or Equipment Description:

K001 - Quad Paint Line with 4 paint cells and 6 spray stations per cell with thermal oxidizer (Modification)

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. d)(10) through (13) and e)(4). .

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

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

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)	The organic compound (OC) emissions from this emissions unit shall not exceed 22.8 pounds per hour and 35.0 tons per year (TPY), including cleanup. See b)(2)a through b)(2)c and c)(1) through (3).
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and MACT)	The combined OC emissions from emissions units K001, K003, and P001, shall not exceed 58.6 TPY based upon a rolling 12-month summation. The OC emissions capture and control system on this emissions unit shall achieve an overall control efficiency 95% by weight. The individual hazardous air pollutant

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		(HAP) emissions from emissions units K001, K003, and P001 shall not exceed 9.9 TPY and combined HAP emissions shall not exceed 24.9 TPY based upon a rolling, 12-month summation. See b)(2)b through b)(2)d and c)(1) through c)(3)..
c.	OAC rules 3745-21-07	The emissions limitations established pursuant to this rule are less stringent than the limitations established according to OAC rule 3745-31-05(A)(3). See b)(2)e.
d.	OAC rule 3745-17-11(C)	See b)(2)(f).
e.	OAC rule 3745-114 and ORC 3704.03(F)(4)(c)	See d)(10) through d)(13) and e)(4).

(2) Additional Terms and Conditions

a. The 22.8 pounds OC/hour limitation was established for PTI purposes to reflect the potential to emit for the emission unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

b. A permanent total enclosure shall be constructed to totally enclose the application stations, coating reservoirs, and all areas from the application station to the oven and the control device. If it can be demonstrated that there is no leakage between the coating application, the oven, and the control device and that the oven and control device are operated under negative pressure, they do not need to be enclosed.

The permanent total enclosure serving this emissions unit shall be maintained under negative pressure as required by this permit whenever the emissions unit is in operation and shall capture all of the OC emissions from this emissions unit. Negative pressure shall be visually monitored using streamers, plastic flow indicating strips, string, or other visually noticeable flow indicating device that shows the direction of air flow through each natural draft opening to be into the enclosure.

c. The OC emissions capture and control system on this emissions unit shall achieve an overall control efficiency of 95% by weight, or the total OC concentration at the outlet shall be less than 15 parts per million by volume, as propane, on a dry basis, which ever is less stringent. The common thermal oxidizer is shared with emissions units K001and K003.

d. The allowable OC, individual HAP, and combined HAP emission rates, as a 12-month rolling limit includes emissions unit P001 permitted under PTI 08-02646.

e. This emissions unit is subject to OAC rules 3745-21-07(M)(1) and (M)(2) effective February 18, 2008. However, the OC emissions limitations of OAC rule 3745-21-07(G) when applying photochemically reactive coatings are still federally enforceable and will not cease to be effective until U.S. EPA approves the revisions as part of the State Implementation Plan (SIP) for ozone. The emissions limitations established according to OAC rule 3745-31-05(A)(3) are more stringent than the emissions limitations established previously by OAC rule 3745-21-07(G)(2) or subsequently by OAC rules 3745-21-07(M)(1) and (M)(2).

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

c) Operational Restrictions

(1) The total OC input from coatings, thinners, and clean up material usage for this emissions unit shall not exceed 1,400,000 pounds based upon a rolling 12-month summation. The permittee has existing coating, thinner, and clean up material usage records and therefore does not need to be limited in the first year on a monthly basis.

(2) The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation. Negative pressure shall be visually monitored using streamers, plastic flow indicating strips, string, or other visually noticeable flow indicating device that shows the direction of air flow through each natural draft opening to be into the enclosure.

(3) The average combustion temperature within the thermal oxidizer, for any 3-hour block of time shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance when the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

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

a. The company identification for each coating, thinner and cleanup material employed.

b. The volume, in gallons, of each coating, thinner and cleanup material employed.

c. The OC content of each coating, thinner and cleanup material, in pounds per gallon as applied.

d. The total OC input rate for all coatings, thinners and cleanup materials, in pounds per month (the product of d)(1)b multiplied by d)(1)c).

e. The controlled OC emission rate for all coatings, thinners and cleanup materials, in pounds per month. The controlled OC emission rate shall be calculated using the capture efficiency (CAP) and the destruction and removal efficiency (DRE) based on the results of the most recent performance test that demonstrated the emissions unit was in compliance (d)(1)d times (1 minus (CAP times DRE))).

(2) The permittee shall collect and record the following information each month for emissions units K001, K003, and P001 combined:

a. The company identification for each coating, thinner and cleanup material employed.

b. The volume, in gallons, of each coating, thinner and cleanup material employed.

c. The OC content of each coating, thinner and cleanup material, in pounds per gallon, as applied.

d. The total uncontrolled OC emission rate for all coatings, thinners and cleanup materials, in pounds per month (the product of d)(2)b multiplied by d)(2)c).

e. The controlled OC emissions rate for all coatings, thinners and cleanup materials where the uncontrolled emissions are captured and vented to the thermal oxidizer, in pounds per month (calculated according to the procedures identified in d)(1)e).

f. The actual OC emissions rate for all coatings, thinners and cleanup materials, in tons (uncontrolled OC emissions not vented to the thermal oxidizer d)(2)d plus controlled OC emissions from the thermal oxidizer d)(2)e) divided by 2,000 lbs/ton)

g. The rolling twelve month total individual OC emissions from all coatings, thinners and cleanup materials employed, in TPY (the sum of the actual emissions d)(2)f for the previous 12 months).

(3) The permittee shall collect and record the following information each month for all materials containing any HAP in emissions units K001, K003, and P001 combined:

a. The company identification for each coating, thinner and cleanup material employed that contains any HAP.

b. The identification of each individual HAP contained in each coating, thinner and cleanup material that contains HAP.

c. The individual HAP content of each coating, thinner and cleanup material, in pounds per gallon, as applied.

d. The volume, in gallons, of each coating, thinner and cleanup material employed that contains any HAP.

e. The total uncontrolled individual HAP emission rate for all coatings, thinners and cleanup materials, in pounds per month (the product of d)(3)c multiplied by d)(3)d).

f. The controlled individual HAP emissions rate for all coatings, thinners and cleanup materials where the uncontrolled emissions are captured and vented to the thermal oxidizer, in pounds per month (calculated according to the procedures identified in d)(1).e)

g. The actual individual HAP emissions rate for all coatings, thinners and cleanup materials, in tons (uncontrolled individual HAP emissions not vented to the thermal oxidizer d)(3)e plus controlled individual HAP emissions from the thermal oxidizer d)(3)f) divided by 2,000 lbs/ton).

h. The rolling twelve month total individual HAP emissions from all coatings, thinners and cleanup materials employed, in TPY (the sum of the actual emissions d)(3)(g) for the previous 12 months).

(4) The permittee shall collect and record the following information each month for all materials containing any HAP in emissions units K001, K003, and P001 combined:

a. The company identification for each coating, thinner and cleanup material employed that contains any HAP.

b. The combined HAP content of each coating, thinner and cleanup material, in pounds per gallon, as applied.

c. The volume, in gallons, of each coating, thinner and cleanup material employed that contains any HAP.

d. The total uncontrolled combined HAP emission rate for all coatings, thinners and cleanup materials, in pounds per month (the product of d)(4)b multiplied by d)(4)c).

e. The calculated, controlled combined HAP emissions rate for all coatings, thinners and cleanup materials where the uncontrolled emissions are captured and vented to the thermal oxidizer, in pounds per month (calculated according to the procedures identified in d)(1)e).

f. The actual combined HAP emissions rate for all coatings, thinners and cleanup materials, in tons (uncontrolled combined HAP emissions not vented to the thermal oxidizer d)(4)d plus controlled combined HAP emissions from the thermal oxidizer d)(4)e) divided by 2,000 lbs/ton)

g. The rolling twelve month total individual HAP emissions from all coatings, thinners and cleanup materials employed, in TPY (the sum of the actual emissions d)(4)f) for the previous 12 months).

(5) The permittee shall install, operate, and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within $\pm$ 1 percent of the temperature being measured or $\pm$ 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications

deemed necessary by the permittee. The permittee shall collect and calculate the average combustion temperature within the thermal oxidizer, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:

a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and

b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit.

c. These records shall be maintained at the facility for a period of three years.

(6) The permittee shall perform daily inspections of the permanent total enclosure to ensure that the following conditions are being maintained when the emissions unit is in operation:

a. all access doors and windows that are not natural draft openings are closed; and

b. the direction of air at each natural draft opening is inward, as shown by streamers, smoke tubes, tracer gases, and/or other air flow monitoring devices.

Records shall be maintained of the results of each daily inspection and shall include any corrective actions taken by the permittee.

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

(8) The permittee shall conduct periodic inspections of the dry filtration system 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. The periodic inspections of the dry filtration system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the dry filtration system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

The permittee shall document each inspection of the dry filtration system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection. These records shall be maintained at the facility for not less than five years from the date the inspection and any

necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(9) In the event that the dry filtration system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the dry filtration system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the dry filtration system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(10) The permit to install for emissions units K001 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

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

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

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

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "**X**" hours per day and "**Y**" days per week, from that of 8 hours per day and 5 days per week. The resulting

calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

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

Toxic Contaminant: toluene (ethylbenzene, glycol ethers, methanol, methyl isobutyl ketone, methyl ethyl ketone, stoddard solvent, xylene)

TLV (mg/m3): 188.4

Maximum Hourly Emission Rate (lbs/hr): 11.4

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,166

MAGLC (ug/m3): 4,486

The permittee, has demonstrated that emissions of toluene, from emissions unit K001 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

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

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

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

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

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

final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

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

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

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

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(13) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) 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.

(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 of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

The total OC input from coatings, thinners, and clean up material usage for this emissions unit shall not exceed 1,400,000 pounds based upon a rolling 12-month summation.

The combined OC emissions from emissions units K001, K003, and P001, shall not exceed 58.6 TPY based upon a rolling 12-month summation.

The individual HAP emissions from emissions units K001, K003, and P001 shall not exceed 9.9 TPY.

The combined HAP emissions from emissions units K001, K003, and P001 shall not exceed 24.9 TPY based upon a rolling, 12-month summation.

All periods of time when the average combustion temperature within the thermal oxidizer was outside of the acceptable range.

All periods of time during which the air flow indicating strips or other flow indicating device, at any natural draft opening, showed no air flow or air flow in a direction leaving the enclosure.

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 appropriate district office or local air agency).

(3) The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:

a. The weight, in pounds, of all coating, thinner and clean up material used.

b. The total OC emissions, in tons, from all coatings, thinner and clean up material used.

These reports shall be submitted by April 15 of each year and shall cover the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

(4) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have

been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

f) Testing Requirements

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

a. Emission Limitation:

The OC emissions from this emissions unit shall not exceed 22.8 lbs/hour.

Applicable Compliance Method:

Compliance shall be based upon the maximum hourly coating usage (91.3 gallons/hour) multiplied by 5.0 lbs OC/gallon coating (456.5 lbs OC/hour) and 95% overall control efficiency for the permanent total enclosure and thermal oxidizer.

b. Emission Limitation:

The OC emissions from this emissions unit shall not exceed 35.0 TPY.

Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in d)(1) and shall be the sum of the monthly OC emissions rates for the 12 months of each calendar year.

c. Emission Limitation:

The combined OC emissions from emissions units K001, K003, and P001, shall not exceed 58.6 TPY based upon a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in d)(2) and shall be sum of the monthly OC emissions rates for the previous 12 months.

d. Emission Limitation:

The individual HAP emissions from emissions units K001, K003, and P001 shall not exceed 9.9 TPY.

Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in d)(3) and shall be sum of the monthly individual HAP emissions rates for the previous 12 months.

e. Emission Limitation:

The combined HAP emissions from emissions units K001, K003, and P001 shall not exceed 24.9 TPY based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in d)(4) and shall be sum of the monthly combined HAP emissions rates for the previous 12 months.

f. Emission Limitation:

The total OC input from coatings, thinners, and clean up material usage for this emissions unit shall not exceed 1,400,000 pounds based upon a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in d)(1) and shall be the sum of the monthly OC usage rates for the previous 12 months.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 12 months after issuance of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the 95% overall control efficiency or less than 15 parts per million by volume, as propane, on a dry basis, limitation for OC emissions.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

U.S. EPA Reference Method 25A of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected

shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

(1) This PTI is a modification PTI 08-2646 (issued 6/1/1993) for emissions unit K001 and represents a reduction in allowable OC emissions from 40 TPY to 35 TPY. This PTI also includes federally enforceable restrictions of the potential to emit for emissions unit K001 that were previously only included in PTI 08-04088 (issued 3/9/2006) as facility restrictions.

2. K003, Cell 13 coating line with thermal oxidizer

Operations, Property and/or Equipment Description:

K003 - Cell 13 coating line with 5 paint spray booths and thermal oxidizer (Modification)

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. d)(10) through (13) and e)(4) .

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

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

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)	The organic compound (OC) emissions from this emissions unit shall not exceed 5.6 pounds per hour and 20.0 tons per year (TPY), including cleanup. See b)(2)a through b(2)c, c)(1) and c)(2).
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and MACT)	The combined OC emissions from emissions units K001, K003, and P001, shall not exceed 58.6 TPY based upon a rolling 12-month summation. The individual hazardous air pollutant (HAP) emissions from emissions units K001, K003, and P001 shall not exceed 9.9 TPY and combined HAP emissions shall not exceed 24.9 TPY based upon a rolling, 12-month summation. See b)(2)b through b)(2)d and c)(1)

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		through c)(3).
c.	OAC rule 3745-21-07	The emissions limitations established pursuant to this rule are less stringent than the limitations established according to OAC rule 3745-31-05(A)(3). See b)(2)e.
d.	OAC rule 3745-17-11(C)	See b)(2)f.
e.	OAC rule 3745-114 and ORC 3704.03(F)(4)(c)	See d)10 through d)(13) and e)4 .

(2) Additional Terms and Conditions

a. The 5.6 pounds OC/hour limitation was established for PTI purposes to reflect the potential to emit for the emission unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

b. Based on a site specific engineering judgement the overall OC capture efficiency for this emissions unit is assumed to be greater than 90% by weight. Enclosing the coating operation, with air flow inward through all natural draft openings (NDOs) of the enclosure will be accepted as a demonstration of negative pressure and 90% capture by weight.

c. The OC emissions capture and control system on this emissions unit shall achieve an overall control efficiency of 85.5% by weight or the total OC concentration at the outlet shall be less than 15 parts per million by volume, as propane, on a dry basis, whichever is less stringent. The common thermal oxidizer is shared with emissions units K001and K003.

d. The allowable OC, individual HAP, and combined HAP emission rates, as a 12-month rolling limit includes emissions unit P001 permitted under PTI 08-02646.

e. This emissions unit is subject to OAC rule 3745-21-07(M)(3)(d)(viii) effective February 18, 2008. However, the OC emissions limitations of OAC rule 3745-21-07(G) when applying photochemically reactive coatings are still federally enforceable and will not cease to be effective when U.S. EPA approves the revisions as part of the State Implementation Plan (SIP) for ozone. The emissions limitations established according to OAC rule 3745-31-05(A)(3) are more stringent than the emissions limitations established previously by OAC rule 3745-21-07(G)(2) or subsequently by OAC rule 3745-21-07(M)(3)(d)(viii).

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

c) Operational Restrictions

(1) The total OC input from coatings, thinners, and clean up material usage for this emissions unit shall not exceed 276,000 pounds based upon a rolling 12-month summation. The permittee has existing coating, thinner, and clean up material usage records and therefore does not need to be limited in the first year on a monthly basis.

(2) All of the coating booths and ovens shall be enclosed and vented to a thermal oxidizer for the control of OC emissions. The enclosure serving this emissions unit shall be maintained under negative pressure whenever this emissions unit is in operation.

(3) The average combustion temperature within the thermal oxidizer, for any 3-hour block of time shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance when the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

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

a. The company identification for each coating, thinner and cleanup material employed.

b. The volume, in gallons, of each coating, thinner and cleanup material employed.

c. The OC content of each coating, thinner and cleanup material, in pounds per gallon as applied.

d. The total OC input rate for all coatings, thinners and cleanup materials, in pounds per month (the product of d)(1)b multiplied by d)(1)c).

e. The controlled OC emission rate for all coatings, thinners and cleanup materials, in pounds per month. The controlled OC emission rate shall be calculated using the capture efficiency (CAP) and the destruction and removal efficiency (DRE) based on the results of the most recent performance test that demonstrated the emissions unit was in compliance (d)(1)d times (1 minus (CAP times DRE))).

(2) The permittee shall collect and record the following information each month for emissions units K001, K003, and P001 combined:

a. The company identification for each coating, thinner and cleanup material employed.

b. The volume, in gallons, of each coating, thinner and cleanup material employed.

c. The OC content of each coating, thinner and cleanup material, in pounds per gallon, as applied.

d. The total uncontrolled OC emission rate for all coatings, thinners and cleanup materials, in pounds per month (the product of d)(2)b multiplied by d)(2)c).

e. The controlled OC emissions rate for all coatings, thinners and cleanup materials where the uncontrolled emissions are captured and vented to the thermal oxidizer, in pounds per month (calculated according to the procedures identified in d)(1)e).

f. The actual OC emissions rate for all coatings, thinners and cleanup materials, in tons (uncontrolled OC emissions not vented to the thermal oxidizer d)(2)d plus controlled OC emissions from the thermal oxidizer d)(2)e divided by 2,000 lbs/ton).

g. The rolling twelve month total OC emissions from all coatings, thinners and cleanup materials employed, in TPY (the sum of the actual emissions d)(2)f for the previous 12 months).

(3) The permittee shall collect and record the following information each month for all materials containing any HAP in emissions units K001, K003, and P001 combined:

a. The company identification for each coating, thinner and cleanup material employed that contains any HAP.

b. The identification of each individual HAP contained in each coating, thinner and cleanup material that contains HAP.

c. The individual HAP content of each coating, thinner and cleanup material, in pounds per gallon, as applied.

d. The volume, in gallons, of each coating, thinner and cleanup material employed that contains any HAP.

e. The total uncontrolled individual HAP emission rate for all coatings, thinners and cleanup materials, in pounds per month (the product of d)(3)c multiplied by d)(3)d).

f. The controlled individual HAP emissions rate for all coatings, thinners and cleanup materials where the uncontrolled emissions are captured and vented to the thermal oxidizer, in pounds per month (calculated according to the procedures identified in d)(1).e)

g. The actual individual HAP emissions rate for all coatings, thinners and cleanup materials, in tons (uncontrolled individual HAP emissions not vented to the thermal oxidizer d)(3)e plus controlled individual HAP emissions from the thermal oxidizer d)(3)f) divided by 2,000 lbs/ton).

h. The rolling twelve month total individual HAP emissions from all coatings, thinners and cleanup materials employed, in TPY (the sum of the actual emissions d)(3)(g) for the previous 12 months).

(4) The permittee shall collect and record the following information each month for all materials containing any HAP in emissions units K001, K003, and P001 combined:

a. The company identification for each coating, thinner and cleanup material employed that contains any HAP.

b. The combined HAP content of each coating, thinner and cleanup material, in pounds per gallon, as applied.

c. The volume, in gallons, of each coating, thinner and cleanup material employed that contains any HAP.

d. The total uncontrolled combined HAP emission rate for all coatings, thinners and cleanup materials, in pounds per month (the product of d)(4)b multiplied by d)(4)c).

e. The calculated, controlled combined HAP emissions rate for all coatings, thinners and cleanup materials where the uncontrolled emissions are captured and vented to the thermal oxidizer, in pounds per month (calculated according to the procedures identified in d)(1)e).

f. The actual combined HAP emissions rate for all coatings, thinners and cleanup materials, in tons (uncontrolled combined HAP emissions not vented to the thermal oxidizer d)(4)d plus controlled combined HAP emissions from the thermal oxidizer d)(4)e) divided by 2,000 lbs/ton)

g. The rolling twelve month total individual HAP emissions from all coatings, thinners and cleanup materials employed, in TPY (the sum of the actual emissions d)(4)f) for the previous 12 months).

(5) The permittee shall install, operate, and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and calculate the average combustion temperature within the thermal oxidizer, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:

a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and

b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit.

These records shall be maintained at the facility for a period of three years.

(6) The permittee shall perform daily inspections of the capture system and maintain a log of the results of each daily inspection that includes the downtime for the capture system when the when the emissions unit is in operation and any corrective actions taken by the permittee. The inspection shall include but not be limited to verification of inward flow

into the enclosure as visually determined using streamers, plastic flow indicating strips, or other visually noticeable flow indicating device.

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

(8) The permittee shall conduct periodic inspections of the dry filtration system 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. The periodic inspections of the dry filtration system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the dry filtration system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

(9) The permittee shall document each inspection of the dry filtration system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection. These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

In the event that the dry filtration system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the dry filtration system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the dry filtration system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(10) The permit to install for emissions units K003 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio

EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

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

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

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

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "**X**" hours per day and "**Y**" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

   Toxic Contaminant: glycol ethers (propylene glycol methyl ether)

   TLV (mg/m3): 843.7

   Maximum Hourly Emission Rate (lbs/hr): 5.6

   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,058

   MAGLC (ug/m3): 20,009

The permittee, has demonstrated that emissions of glycol ethers, from emissions unit K003 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic

air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

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

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

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

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

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

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

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

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

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F),

initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(13) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) 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.

(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 of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

The total OC input from coatings, thinners, and clean up material usage for this emissions unit shall not exceed 276,000 pounds based upon a rolling 12-month summation.

The combined OC emissions from emissions units K001, K003, and P001, shall not exceed 58.6 TPY based upon a rolling 12-month summation.

The individual HAP emissions from emissions units K001, K003, and P001 shall not exceed 9.9 TPY.

The combined HAP emissions from emissions units K001, K003, and P001 shall not exceed 24.9 TPY based upon a rolling, 12-month summation.

All periods of time when the average combustion temperature within the thermal oxidizer was outside of the acceptable range.

All periods of time during which the OC capture system.

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 appropriate district office or local air agency).

(3) The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:

a. The weight, in pounds, of all coating, thinner and clean up material used.

b. The total OC emissions, in tons, from all coatings, thinner and clean up material used.

These reports shall be submitted by April 15 of each year and shall cover the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

(4) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

f) Testing Requirements

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

a. Emission Limitation:

Applicable Compliance Method:

Compliance shall be based upon the maximum hourly coating usage (24 gallons/hour) multiplied by 1.6 lbs OC/gallon coating (38.4 lbs OC/hour) and 85.5% overall control efficiency (90% capture and 95% destruction efficiency) for the OC capture system and thermal oxidizer.

b. Emission Limitation:

The OC emissions from this emissions unit shall not exceed 20.0 TPY.

Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in d)(1) and shall be the sum of the monthly OC emissions rates for the 12 months of each calendar year.

c. Emission Limitation:

The combined OC emissions from emissions units K001, K003, and P001, shall not exceed 58.6 TPY based upon a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in d)(2) and shall be sum of the monthly OC emissions rates for the previous 12 months.

d. Emission Limitation:

The individual HAP emissions from emissions units K001, K003, and P001 shall not exceed 9.9 TPY.

Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in d)(3) and shall be sum of the monthly individual HAP emissions rates for the previous 12 months.

e. Emission Limitation:

The combined HAP emissions from emissions units K001, K003, and P001 shall not exceed 24.9 TPY based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in d)(4) and shall be sum of the monthly combined HAP emissions rates for the previous 12 months.

f. Emission Limitation:

The total OC input from coatings, thinners, and clean up material usage for this emissions unit shall not exceed 276,000 pounds based upon a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in d)(1) and shall be the sum of the monthly OC usage rates for the previous 12 months.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 12 months after issuance of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the 85.5% overall control efficiency or less than 15 parts per million by volume, as propane, on a dry basis, limitation for OC emissions.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

U.S. EPA Reference Method 25A of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The destruct and removal efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

(1) This PTI is a modification PTI 08-04088 issued 3/9/06 for emissions unit K003 and represents a reduction in allowable OC emissions from 25.29 TPY to 20 TPY. The emissions reduction was achieved by removing the mask washers from this emissions and increasing the capture efficiency of the remaining spray booths to 90%. This PTI also includes federally enforceable restrictions of the potential to emit for emissions unit K003 that were previously included in PTI 08-04088 as facility restrictions.