



State of Ohio Environmental Protection Agency

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

8/22/2008

Jerry Johns
R&L Transfer, Inc. - Tractor Body Shop
600 Gillam Road
Wilmington, OH 45177

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0514000189
Permit Number: P0088741
Permit Type: Renewal
County: Clinton

Certified Mail

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

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 Ohio EPA DAPC, Southwest District Office. 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: Ohio EPA-SWDO

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

FINAL

**Air Pollution Permit-to-Install and Operate
for
R&L Transfer, Inc. - Tractor Body Shop**

Facility ID: 0514000189
Permit Number: P0088741
Permit Type: Renewal
Issued: 8/22/2008
Effective: 8/22/2008
Expiration: 8/22/2013



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
 for
 R&L Transfer, Inc. - Tractor Body Shop

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Final Permit-to-Install and Operate
Permit Number: P0088741
Facility ID: 0514000189
Effective Date: 8/22/2008

Authorization

Facility ID: 0514000189
Application Number(s): A0019923
Permit Number: P0088741
Permit Description: Truck Paint Booth w/ HVLP spray gun, Natural gas oven, and paper filters
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 8/22/2008
Effective Date: 8/22/2008
Expiration Date: 8/22/2013
Permit Evaluation Report (PER) Annual Date: May 15, for April 1 - March 31

This document constitutes issuance to:

R&L Transfer, Inc. - Tractor Body Shop
2483 State Route 22/3 West
Wilmington, OH 45177

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

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0088741

Facility ID: 0514000189

Effective Date: 8/22/2008

Authorization (continued)

Permit Number: P0088741

Permit Description: Truck Paint Booth w/ HVLP spray gun, Natural gas oven, and paper filters

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:

Truck Paint Booth with HVLP spray guns, natural gas ove

Superseded Permit Number:

General Permit Category and Type:

Not Applicable



State of Ohio Environmental Protection Agency
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Final Permit-to-Install and Operate

Permit Number: P0088741

Facility ID: 0514000189

Effective Date: 8/22/2008

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, Southwest 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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0088741

Facility ID: 0514000189

Effective Date: 8/22/2008

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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

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B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0088741

Facility ID: 0514000189

Effective Date: 8/22/2008

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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0088741

Facility ID: 0514000189

Effective Date: 8/22/2008

C. Emissions Unit Terms and Conditions



1. K001, Truck Paint Booth with HVLP spray guns, natural gas ovens, and paper filters.

Operations, Property and/or Equipment Description:

Truck Paint Booth with HVLP spray guns, natural gas ovens, and paper 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. 1.b)(1)f., 1.d)(3), (4), and (5)

(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. 1.b)(1)b., 1.b)(1)c., 1.b)(2)b., 1.c), 1.d)(2)

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 05-14420	<p>The volatile organic compound (VOC) emissions from the coatings employed in this emissions unit shall not exceed 90.0 lbs/day.</p> <p>The VOC content of liquid organic cleanup materials employed in this emissions unit shall not exceed 8.18 lbs/gallon, as applied.</p> <p>The emissions from natural gas combustion in the drying ovens shall not exceed the following:</p> <p>0.87 lb/hr and 3.81 tons/yr NOx; 0.73 lb/hr and 3.20 tons/yr CO; 0.07 lb/hr and 0.29 ton/yr PM; 0.005 lb/hr and 0.02 ton/yr SO2; and 0.048 lb/hr and 0.21 ton/yr VOC.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>This emissions unit shall be equipment with a dry filter system that minimizes the release of particulate emissions from the coating operations.</p> <p>See 1.b)(2)a., below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(iii), OAC rules 3745-17-07(A) and 3745-17-10(B) for the drying ovens and OAC rule 3745-31-05(D).</p>
b.	<p>OAC rule 3745-31-05(D) Synthetic Minor to Avoid MACT applicability (40 CFR Part 63 subpart MMMM) and Title V</p>	<p>Total combined VOC from the coating and cleanup operations shall not exceed 5.12 tons per rolling, 12-month period.</p> <p>The hazardous air pollutants (HAP(s)) emissions from this emissions unit shall not exceed 5.12 tons per rolling, 12-month period.</p> <p>See terms 1.b)(2)b. and 1.c)(1) below.</p>
c.	<p>OAC rule 3745-21-09(U)(2)(e)(iii)</p>	<p>The coatings usage in this emissions unit shall not exceed ten gallons per day.</p>
d.	<p>OAC rule 3745-17-07(A) (for the drying ovens)</p>	<p>The Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.</p>
e.	<p>OAC rule 3745-17-10(B)</p>	<p>The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>
f.	<p>OAC rule 3745-114-01</p>	<p>Ohio Toxics Policy</p>

(2) Additional Terms and Conditions

- a. The emission limitations for PM, SO₂, NO_x, CO and VOC from combustion of natural gas in the drying ovens is established to reflect potential to emit for this emissions unit. Therefore, record keeping and reporting requirements are not necessary to ensure compliance with these limits.



- b. This permit establishes federally enforceable limitations on emissions of HAPs for purposes of avoiding 40 CFR part 63 subpart M and Title V requirements. Based on information provided in the permit to install application, the facility Potential to Emit (PTE) for Hazardous Air Pollutants (HAP) is below the major source thresholds of 10 tons per year or more of any single HAP and 25 tons per year or more of any combination of HAP based on the facility operations and the maximum HAP content of the coatings and cleanup solvent used. If any changes in the operations and/or coating and cleanup solvent formulations occur, the PTE calculation should be modified accordingly. Any increase in PTE above the major source thresholds would subject the source to any applicable Maximum Achievable Control Technology (MACT) and Title V requirements.

Annual HAP emissions from this emissions unit shall not exceed 5.12 tons per year for total combined HAPs, based on a rolling, 12-month summation of the monthly HAP emissions.

c) Operational Restrictions

- (1) The coating usage in this emissions unit shall not exceed 1000 gallons per rolling 12-month period. This is an existing emissions unit and therefore the permittee has existing coating usage records and does not need to be limited on a monthly basis for the first year.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following each day for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the total volume, in gallons, of all coatings employed; and
 - d. the daily VOC emissions from the coatings employed, in pounds.
- (2) The permittee shall collect and record the following for each month for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon, as applied;
 - d. the VOC emissions from the coatings employed, in pounds, (the summation of all coatings ("b" x "c");



- e. the name and identification of each cleanup material employed;
- f. the number of gallons of each cleanup material employed;
- g. the VOC content of each cleanup material, in pounds per gallon;
- h. the total VOC emissions from all coatings and cleanup materials employed (the summation of all coatings in term 1.d)(2)(d) and cleanup materials ("f" x "g"), in pounds or tons; and
- i. the rolling, 12-month total combined VOC* emissions, in tons, (the total VOC emitted, in tons, for the current month plus the total amount of VOC emitted, in tons, for the 11 previous calendar months).

*for the purposes of establishing documentation of the amount of HAP emissions emitted from this emissions unit, it is assumed that all HAP are VOC and therefore record keeping of the amount of HAP emissions emitted is not required.

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

Pollutant: Toluene
 TLV (ppm): 20 (per R & L)
 Maximum Hourly Emission Rate (g/s): 5.67
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 740.5
 MAGLC (ug/m3): 1794.3

Pollutant: Xylene
 TLV (ppm): 100
 Maximum Hourly Emission Rate (g/s): 4.88
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 636.7
 MAGLC (ug/m3): 10,337.9

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



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

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

- (5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - (a) a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - (b) documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - (c) where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- e) Reporting Requirements
 - (1) The permittee shall notify the Director of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. A copy of such record shall be sent to the Director within 45 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. the daily VOC emissions from the coatings employed exceed 90 pounds;
 - ii. the coating usage exceed 1000 gallons per rolling 12-month period;
 - iii. the VOC emissions, from the use of coatings and cleanup, exceed 5.12 tons per rolling 12-month period; and
 - iv. the HAP(s) emissions, from this emissions unit, exceed 5.12 tons per rolling 12-month period.
- 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) 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 limitation(s) in section 1.b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation



90.0 pounds of VOC per day, from coatings employed.

Applicable Compliance Method:

Compliance with the daily allowable VOC emission limitation shall be determined through the record keeping requirements established in Section 1.d)(1), of this permit.

b. Emission Limitation:

5.12 tons of VOC per 12-month rolling period, from coatings and cleanup employed.

Applicable Compliance Method:

Compliance with the annual 12-month rolling period allowable VOC emission limitation shall be determined through the record keeping requirements established in Section 1.d)(2) of this permit.

c. Emission Limitation:

20% Opacity, as a six minute average, from the stack.

Applicable Compliance Method:

If required, 40 CFR Part 60, Method 9, with opacity readings taken from the stack.

(2) The emissions from natural gas combustion in the drying ovens shall not exceed the following:

- 0.87 lb/hr and 3.81 tons/yr NOx;
- 0.73 lb/hr and 3.20 tons/yr CO;
- 0.07 lb/hr and 0.29 ton/yr PM;
- 0.005 lb/hr and 0.02 ton/yr SO₂; and
- 0.048 lb/hr and 0.21 ton/yr VOC.

Applicable Compliance Method:

Compliance with the limits for natural gas combustion within the drying ovens shall be based upon the emission factors from AP-42 "Compilation of Air Pollutant Emission Factors", Tables 1.4-1 and 1.4-2 (7/98). These emission factors (lb pollutant/106 scf) multiplied by the maximum combined hourly gas burning capacity of the burners (8.87 mmBtu) and times 1 scf/1020 Btu shall be the demonstration of compliance with the hourly limits. Compliance with the ton per year limits are documented by multiplying the calculated hourly limits by 8760 hours in a year and dividing by 2000 pounds.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0088741

Facility ID: 0514000189

Effective Date: 8/22/2008

g) Miscellaneous Requirements

None.