



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

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www.epa.state.oh.us

MAILING ADDRESS:

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

9/5/2008

Michael Conny
MAC Trailer Mfg. Inc.
14599 Commerce Street
Alliance, OH 44601

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1576001906
Permit Number: P0101100
Permit Type: Renewal
County: Stark

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 Canton City Health Department. 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: Canton

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
MAC Trailer Mfg. Inc.**

Facility ID: 1576001906
Permit Number: P0101100
Permit Type: Renewal
Issued: 9/5/2008
Effective: 9/5/2008
Expiration: 9/5/2018



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
 for
 MAC Trailer Mfg. Inc.

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Final Permit-to-Install and Operate
Permit Number: P0101100
Facility ID: 1576001906
Effective Date: 9/5/2008

Authorization

Facility ID: 1576001906
Application Number(s): A0032861
Permit Number: P0101100
Permit Description: Permit is for three paint booths and a shot blasting room.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 9/5/2008
Effective Date: 9/5/2008
Expiration Date: 9/5/2018
Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15
This document constitutes issuance to:

MAC Trailer Mfg. Inc.
14599 Commerce Street
Alliance, OH 44601

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:

Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544
(330)489-3385

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: P0101100
Permit Description: Permit is for three paint booths and a shot blasting room.

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

Emissions Unit ID:	P001
Company Equipment ID:	Blast
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Spray Booth Group

Emissions Unit ID:	K001
Company Equipment ID:	Spray Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Spray Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Spray Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0101100

Facility ID: 1576001906

Effective Date: 9/5/2008

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 Canton City Health Department 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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0101100

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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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

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Effective Date: 9/5/2008

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: P0101100

Facility ID: 1576001906

Effective Date: 9/5/2008

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: P0101100

Facility ID: 1576001906

Effective Date: 9/5/2008

C. Emissions Unit Terms and Conditions



1. Spray Booth Group (K001, K002, K003)

Operations, Property and/or Equipment Description:

Tractor-trailer paint booths No. 1, No. 2 and No. 3

- 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. Term C. 1. h)
 - (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. Term C. 1. c)
- 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 15-01483 (Synthetic minor with federally enforceable limits to avoid Title V)	<p>The volatile organic compounds (VOC) emissions shall not exceed 17.29 pounds/hour and 52.5 tons/year from coating operations.</p> <p>The combined VOC emissions from emissions units K001-K003 shall not exceed 17.29 pounds/hour and 52.5 tons/year from coating operations.</p> <p>3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.</p> <p>The cleanup/purge material employed shall not contain more than 6.8 pounds of VOC per gallon.</p> <p>The combined VOC emissions from</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>emissions units K001-K003 from the use of cleanup/purge materials shall not exceed 0.67 ton/yr.</p> <p>The particulate emissions (PE) shall not exceed 2.41 tons/year.</p> <p>The PM10 emissions shall not exceed 0.551 lb/hr and 2.41 tons/year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and 3745-17-11(B)(1).</p>
c.	OAC rule 3745-21-09(U)	The emission limitations specified by this rule are equivalent or less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

2) Additional Terms and Conditions

The hourly emission limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with the hourly VOC emission limit. The maximum annual coating and cleanup/purge material usage and the combined annual emissions from the entire facility (K001 - K003) shall not exceed the following as rolling, 12-month summations:

- 22,000 gallons of top coat employed per year;
- 8,000 gallons of primer employed per year;
- 198 gallons of cleanup/purge material net usage per year (material employed minus material recovered);
- 24.0 tons of all hazardous air pollutants (HAPs); and
- 9.00 tons of any individual HAP.

Compliance with the annual coating and cleanup/purge material usage limitations and facility-wide HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable combined annual emission limitations, in tons.



- c) Operational Restrictions
 - (1) This emissions unit shall only employ HVLP spray guns.
- d) Monitoring and/or Record Keeping Requirements
 - (1) The permittee shall collect and record the following information each month for each coating and cleanup/purge material employed in emissions units K001, K002, and K003:
 - a. the name and identification number of each coating and cleanup/purge material, as applied;
 - b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup/purge material, as applied;
 - c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));
 - e. the number of gallons of each coating employed;
 - f. the name and identification of each cleanup/purge material employed;
 - g. the individual HAP content for each HAP of each cleanup/purge material, in pounds of individual HAP per gallon of cleanup/purge material, as applied;
 - h. the total combined HAP content of each cleanup/purge material, in pounds of combined HAPs per gallon of cleanup/purge material, as applied (sum all the individual HAP contents from (g));
 - i. the net number of gallons of each cleanup/purge material employed (the number of gallons of cleanup/purge material employed minus the number of gallons of cleanup/purge material recovered);
 - j. the total combined HAP emissions from all coatings and cleanup/purge materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup/purge materials);
 - k. the total combined HAP emissions from all coatings and cleanup/purge materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup/purge material);
 - l. the total VOC emissions from all coatings and cleanup/purge materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);
 - m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup/purge materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);



- n. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup/purge materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months);

and the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup/purge materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

- (2) 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 shows the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

- (1) The permittee shall notify the Canton LAA in writing of any daily record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Canton LAA within 30 days following the end of the calendar month.
- (2) The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility coating usage limitation and the emission limitation for VOC, individual HAP and combined HAP.
- (3) The deviation reports shall be submitted as specified in Standard Terms and Conditions of this permit.
- (4) The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for K001, K002, and K003, and the annual coating usage, in gallons.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
- (2) Emissions Limitation:
The combined VOC emissions from emissions units K001-K003 shall not exceed 17.29 pounds/hour from coating operations.



Applicable Compliance Method:

Compliance with the hourly limitation shall be established by multiplying the coating maximum allowable VOC content (3.5 bs/gallon) by the maximum hourly coating usage (3.79 gal/hr top coat + 1.15 gal/hr primer = 4.94 gal/hr).

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Emissions Limitation:

The combined VOC emissions from emissions units K001-K003 shall not exceed 52.5 tons/year from coating operations.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the recordkeeping requirements of these T&Cs.

Emissions Limitation:

The combined VOC emissions from emissions units K001-K003 from the use of cleanup/purge materials shall not exceed 0.67 ton/yr.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of these T&Cs.

Emissions Limitation:

24.0 tpy of all HAPs for entire facility

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the recordkeeping requirements of these T&Cs.

Emissions Limitation:

9.0 tpy of any individual HAP for entire facility

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the recordkeeping requirements of e) above.

USEPA Method 24 shall be used to determine the VOC contents for all coatings employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating,



the owner or operator shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Emissions Limitation:

PE and PM10 emissions shall not exceed 0.51 pound per hour

Applicable Compliance Method:

To determine the hourly worst case emission rate for particulate matter, the following equation shall be used:

$$E = CSh \text{ (pounds per hour)} \times (1 - TE) \times (1 - CE)$$

CSh = maximum coating solids usage rate, calculated by multiplying the paint density (lbs/gal), by the percent of solids by weight of the paint, and by the maximum amount of paint that can be sprayed in gallons per hour.

TE = transfer efficiency, which is the ratio of the amount of coatings solids deposited on the coated part to the amount of coating solids used (70% for HVLP air spray gun)

CE = control efficiency of the control equipment (79% for panel filters)

Emissions Limitation:

PE and PM10 emissions shall not exceed 2.41 tons per year

Applicable Compliance Method:

To determine the annual worst case emissions for particulate matter, the following equation shall be used:

$$E = CSa \text{ (pounds per hour)} \times (1 - TE) \times (1 - CE)/2000$$

CSa = maximum coating solids usage rate, calculated by multiplying the paint density (lbs/gal), by the solids percent by weight, and by the annual gallons of coating used, calculated at the 12th month of the rolling, 12-month record

TE = transfer efficiency, which is the ratio of the amount of coatings solids deposited on the coated part to the amount of coating solids used (70% for air spray gun)

CE = control efficiency of the control equipment (79% for panel filters)

Compliance with the usage restrictions and operational limitations in of these terms and conditions shall be determined in accordance with the following methods:

Usage Restriction:

22,000 gallons of top coat coating employed per year

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and recordkeeping requirements.



Usage Restriction:

8,000 gallons of primer coating employed per year

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and recordkeeping requirements.

Usage Restriction:

198 gallons of cleanup/purge material net usage per year (material employed minus material recovered).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and recordkeeping requirements.

g) Miscellaneous Requirements

The permit to operate for these emissions unit (K001-K003) was evaluated based on the actual materials (typically coatings and cleanup 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 from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: 2-butoxyethanol

TLV (mg/m³): 96.7

Maximum Hourly Emission Rate (lbs/hr): 2.31

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,099

MAGLC (ug/m³): 2,302

Pollutant: methyl n-amyl ketone

TLV (mg/m³): 233.5

Maximum Hourly Emission Rate (lbs/hr): 4.14

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3,761

MAGLC (ug/m³): 5,559

Pollutant: methyl isobutyl ketone

TLV (mg/m³): 205

Maximum Hourly Emission Rate (lbs/hr): 2.28

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,071

MAGLC (ug/m³): 4,880

Pollutant: xylene



TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 2.65

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,408

MAGLC (ug/m3): 10,333

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:

- (1) 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 previously modeled;
- (2) 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
- (3) 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(VV)(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 (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.



2. P001, Blast

Operations, Property and/or Equipment Description:

Sand blast booth

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

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

a. None.

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

a. None.

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 15-01483	The particulate emissions (PE) shall not exceed 1.97 lbs/hour & 8.63 tons/year. The PM10 shall not exceed 1.97 lbs/hour & 8.63 tons/year. Visible emissions shall not exceed 5% opacity as a six-minute average.
b.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	The emission limitation specified by



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

- (2) Additional Terms and Conditions
- (3) Best Available Technology" (BAT) for this emissions unit has been determined to be use of a baghouse, with a maximum outlet concentration of 0.01 gr/dscf.
- c) Operational Restrictions
 - (1) The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.
- d) Monitoring and/or Record Keeping Requirements
 - (1) The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
- e) Reporting Requirements
 - (1) In accordance with the general terms and conditions of this permit, the permittee shall submit deviation (excursion) reports that identify any and all exceedances of the following:
 - (2) All periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
- f) Testing Requirements
 - (1) Compliance with the emissions limitations in this permit to install shall be determined in accordance with the following methods:

Emissions Limitation:

The PM10 emissions shall not exceed 1.97 lbs/hour & 8.63 tons/year.

Applicable Compliance Method: The permittee shall demonstrate compliance with the hourly emission limitation by multiplying a maximum outlet concentration of 0.01 gr/dscf * a maximum volumetric air flow rate of 23,000 ascfm * 60 minutes/hour * 1 lb/7000 grains. If required, stack testing shall be performed in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.



The tons/yr was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Emissions Limitation:

The particulate emissions (PE) shall not exceed 1.97 lbs/hour & 8.63 tons/year.

Applicable Compliance Method: The permittee shall demonstrate compliance with the hourly emission limitation by multiplying a maximum outlet concentration of 0.01 gr/dscf * a maximum volumetric air flow rate of 23,000 ascfm * 60 minutes/hour * 1 lb/7000 grains. If required, stack testing shall be performed in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

The tons/yr was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Emissions Limitation: Visible emissions shall not exceed 5% opacity as a six-minute average

Applicable Compliance Method: If required, compliance with the visible emissions limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Method 9.