State of Ohio Environmental Protection Agency

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

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

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

Certified Mail

11/21/2008

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No	MODELING SUBMITTED

MATT MYKYTUK
Tiffin Metal Products Co
450 WALL STREET
TIFFIN, OH 44883

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0374020165
Permit Number: P0087737
Permit Type: Renewal
County: Seneca

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, Northwest 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-NWDO

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

Air Pollution Permit-to-Install and Operate
for
Tiffin Metal Products Co

Facility ID:	0374020165
Permit Number:	P0087737
Permit Type:	Renewal
Issued:	11/21/2008
Effective:	11/21/2008
Expiration:	11/21/2013

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
Tiffin Metal Products Co

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Authorization

Facility ID: 0374020165
Application Number(s): A0018786
Permit Number: P0087737
Permit Description: FESOP Application
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 11/21/2008
Effective Date: 11/21/2008
Expiration Date: 11/21/2013
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15
This document constitutes issuance to:

Tiffin Metal Products Co
450 WALL STREET
TIFFIN, OH 44883

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, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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: P0087737
Permit Description: FESOP Application

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

Emissions Unit ID:	**K002**
Company Equipment ID:	POSTER PAINT LINE
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K003**
Company Equipment ID:	PRIME BOOTH
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. **Who is responsible for complying with this permit?**

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

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

3. **What records must I keep under this permit?**

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

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

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

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

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

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

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

   This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. K002, POSTER PAINT LINE

Operations, Property and/or Equipment Description:

Poster paint line - sentinel spray booths with dry filtration and infrared drying tunnel

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 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)	0.551 pound PE/hour
c.	OAC rule 3745-21-09(A)(3)(b)(ii)	See b)(2)a.
d.	OAC rule 3745-31-05(D)	99.9 tons volatile organic compounds (VOC) per rolling, 12-month period for emissions units K002 and K003 and from natural gas combustion sources at the facility, combined [See b)(2)a.] 9.9 tons per rolling, 12-month period for any individual hazardous air pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units K002 and K003, combined [See b)(2)b.]

(2) Additional Terms and Conditions

a. In order for emissions unit K002 to avoid the requirements of OAC rule 3745-21-09(U), pursuant to OAC rule 3745-21-09(A)(3)(b)(ii), the permittee has requested a federally enforceable emission limitation of 99.9 tons VOC per rolling, 12-month period from emissions units K002 and K003 and from the natural gas combustion sources located at the facility, combined [See section g)(1)].

b. The permittee has requested federally enforceable emission limitations of 9.9 tons of any individual Hazardous Air Pollutant (HAP), as defined in Section 112(b) of the Clean Air Act, and 24.9 tons of combined HAPs per rolling, 12-month period for emissions units K002 and K003, combined, for the purposes of avoiding Title V permitting and the requirements of 40 CFR Part 63, Subpart MMMM.

To ensure federal enforceability during the first 12 calendar months of operation after issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

MAXIMUM ALLOWABLE CUMULATIVE HAP EMISSION RATES:

Months	Individual HAPs	Combined HAPs
1-1	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23
1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60
1-9	7.43	18.68
1-10	8.25	20.75
1-11	9.08	22.83
1-12	9.9	24.9

After the first 12 calendar months of operation after issuance of this permit, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates for emissions units K002 and K003, combined.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the natural gas combustion sources located at the facility:

a. the amount of natural gas consumed (in million cubic feet);

b. the total emissions of VOC, in tons, from natural gas combustion, calculated as follows:

VOC emissions (tons/month) = [million cubic feet of natural gas [from d)(1)a.] x 5.5* pounds VOC per million cubic feet] / (2000 pounds/ton)

*VOC emission factor based on USEPA AP-42, Table 1.4-2 (revised 3/98).

(2) The permittee shall collect and record the following information each month for emissions units K002 and K003, separately:

a. the name and identification number of each coating and cleanup material employed;

b. the volume, in gallons, of each coating and cleanup material employed;

c. the VOC content of each coating and cleanup material, in pounds per gallon, as applied;

d. the VOC emission rates for each coating and cleanup material [b x c], in pounds; and

e. the total VOC emission rate for all the coatings and cleanup materials employed, in tons [summation of (d) for all coatings and cleanup materials, divided by 2000 pounds/ton].

Note: The coating information must be for the coatings, as employed, including any thinning solvents added at the emissions unit.

(3) If a credit for recovered cleaning solution is used to demonstrate compliance and/or used in the rolling, 12-month VOC emission calculations, the permittee shall maintain the following monthly records for the recovered cleaning solution and the recovery drum or tank serving emissions units K002 and K003:

a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off-site;

b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;

c. a record of the VOC content of each cleanup solvent material that is collected for recovery, in pounds/gallon, or a record of the testing results of the VOC content for the material shipped;

d. the mass (pounds) of VOC to be credited to the VOC emissions, from each shipment of recovered material, calculated using the lowest VOC content of any cleanup solvent material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped [(b) x (c)], and the date of each such shipment or record of credit; and

e. the record of the total amount of VOC emissions, in tons, that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility [summation of (d) for each shipment recorded during the month divided by 2000 pounds/ton].

(4) In order to demonstrate compliance with the rolling, 12-month VOC emission limitation, the permittee shall collect and record the following information each month for emissions units K002 and K003 and the natural gas combustion sources, combined:

a. the total monthly VOC emissions, in tons (summation of [d)(1)b.] and [d)(2)e.] for K002 and K003 less any recovered VOC credits from [d)(3)e.]); and

b. the rolling, 12-month summation of the total monthly VOC emission rates, in tons.

(5) In order to demonstrate compliance with the rolling, 12-month HAP emission limitations, the permittee shall collect and record the following information for emissions units K002 and K003, combined:

a. the company identification of each coating employed;

b. the HAP content, in pounds per gallon, of each HAP in each coating and cleanup material employed, as applied;

c. the volume, in gallons, of each coating and cleanup material employed;

d. the emission rate, in pounds, for each HAP from each coating and cleanup material employed [b x c];

e. the total emission rate, in tons per month, for each HAP from all the coatings and cleanup materials employed (summation of d for each HAP divided by 2000 pounds/ton, less any recovered HAP credits from [d)(6)c.]);

f. the total HAP emission rate, in tons per month, for the combination of all HAPs from all the coatings and cleanup materials employed (summation of (e) divided by 2000 pounds/ton, less any recovered HAP credits from [d)(6)d.]);

g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month, and

h. after the first 12 months of operation under the provisions of this permit, the annual emissions of each HAP and the combination of all HAPs, in tons, , based upon rolling, 12-month summations.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

(6) If a credit for recovered cleaning solution is used to demonstrate compliance and/or used in the rolling, 12-month HAP emission calculations, the permittee shall maintain the following monthly records for the recovered cleaning solution and the recovery drum or tank serving emissions units K002 and K003, in addition to the information specified in Section d)(3):

a. the percent, by weight, of each individual HAP present in the materials shipped for recycle/recovery and/or disposal at an outside facility; and/or

b. the percent, by weight, of all HAPs present in the materials shipped for recycle/recovery and/or disposal at an outside facility; and

c. the emission rate of each HAP, in tons, that may be applied as a credit for the materials shipped for recycle/recovery and/or disposal at an outside facility [tons VOC emissions that may be applied as a credit [d)(3)e.] multiplied by (a)]; and/or

d. the combined HAP emission rate, in tons, that may be applied as a credit for the materials shipped for recycle/recovery and/or disposal at an outside facility [tons VOC emissions that may be applied as a credit [d)(3)e.] multiplied by (b)].

(7) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports, in accordance with the Standard Terms and Conditions of this permit, for emissions units K002 and K003, combined, that identify any exceedances of the rolling, 12-month VOC emission limitation.

(2) The permittee shall submit quarterly deviation (excursion) reports, in accordance with the Standard Terms and Conditions of this permit, for emissions units K002 and K003, combined, as follows:

a. For the first 12 calendar months of operation, the permittee shall submit deviation (excursion) reports, which identify any exceedances of the maximum allowable cumulative HAP emission levels specified in section b)(2)b.

b. After the first 12 calendar months of operation, the permittee shall submit deviation (excursion) reports, which identify any exceedances of the rolling, 12-month HAP emission limitations.

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

f) Testing Requirements

(1) Compliance with the emission limitations specified in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation in accordance with OAC rule 3745-17-03(B)(1).

b. Emission Limitation: 0.551 pound PE/hour

Applicable Compliance Method: To determine the actual worst-case PE rate (E), the following equation may be used for the coating operation:

E = PE rate (lbs/hr)

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

Where:

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used for the spray stations (25% considering 40 CFR 60.313, Table 1), expressed as a fraction

CE = control efficiency of the control equipment (assumed to be 98%), expressed as a fraction

If required, the permittee shall demonstrate compliance with the above limitation in accordance with OAC rule 3745-17-03(B)(10).

c. Emission Limitation: 99.9 tons VOC per rolling, 12-month period, for emissions units K002 and K003 and from natural gas combustion sources at the facility, combined

Applicable Compliance Method: The permittee shall demonstrate compliance with this emission limitation in accordance with the record keeping requirements specified in Sections d)(1), d)(2), d)(3), and d)(4).

d. Emission Limitation: 9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units K002 and K003, combined

Applicable Compliance Method: The permittee shall demonstrate compliance with this emission limitation in accordance with the record keeping requirements specified in Sections d)(5) and d)(6).

(2) Method 24 of 40 CFR Part 60, Appendix A or formulation data shall be used to determine the VOC contents of the coating and cleanup materials.

g) Miscellaneous Requirements

(1) The natural gas combustion sources located at this facility are exempt from any Ohio EPA permitting requirements. However, the exemption provided for in OAC rule 3745-21-09(A)(3)(b)(ii) is inclusive of all VOC emissions at the facility. Therefore, it is necessary for the permittee to maintain accurate records of their VOC emissions from natural gas usage in order for emissions unit K002 to avoid the requirements of OAC rule 3745-21-09(U).

2. K003, PRIME BOOTH

Operations, Property and/or Equipment Description:

Primer paint booth #1 with dry filtration and infrared drying tunnel

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 #03-4450, issued 9/27/89)	12.85 tons volatile organic compounds (VOC)/year See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)	0.551 pound PE/hour
d.	OAC rule 3745-21-09(U)(2)(e)(iii)	The permittee shall not use more than 10 gallons of coating materials per day for the coating of miscellaneous metal parts.
e.	OAC rule 3745-31-05(D)	99.9 tons volatile organic compounds (VOC) per rolling, 12-month period, for emissions units K002 and K003 and from natural gas combustion sources at the facility, combined [See b)(2)b.] 9.9 tons per rolling, 12-month period for any individual hazardous air pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emissions units K002 and K003, combined [See b)(2)c.]

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(e)(iii) and 3745-31-05(D) and the terms and conditions of this permit.

b. In order for emissions unit K002 to avoid the requirements of OAC rule 3745-21-09(U), pursuant to OAC rule 3745-21-09(A)(3)(b)(ii), the permittee has requested a federally enforceable emission limitation of less than 100 tons VOC per rolling, 12-month period from emissions units K002 and K003 and from the natural gas combustion sources located at the facility, combined [See section g)(1)].

c. The permittee has requested federally enforceable limitations of 9.9 tons of any individual Hazardous Air Pollutant (HAP), as defined in Section 112(b) of the Clean Air Act, and 24.9 tons of combined HAPs per rolling, 12-month period for emissions units K002 and K003, combined, for the purposes of avoiding Title V permitting and the requirements of 40 CFR Part 63, Subpart MMMM.

To ensure federal enforceability during the first 12 calendar months of operation after issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

MAXIMUM ALLOWABLE CUMULATIVE HAP EMISSION RATES:

Months	Individual HAPs	Combined HAPs
1-1	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23
1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60
1-9	7.43	18.68
1-10	8.25	20.75

1-11	9.08	22.83
1-12	9.9	24.9

After the first 12 calendar months of operation after issuance of this permit, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates for emissions units K002 and K003, combined.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the natural gas combustion sources located at the facility:

a. the amount of natural gas consumed (in million cubic feet);

b. the total monthly emissions of VOC, in tons, from natural gas combustion, calculated as follows:

VOC emissions (tons/month) = [million cubic feet of natural gas [from d)(1)a.] x 5.5* pounds VOC per million cubic feet] / (2000 pounds/ton)

*VOC emission factor based on USEPA AP-42, Table 1.4-2 (revised 3/98).

(2) The permittee shall collect and record the following information each month for emissions units K002 and K003, separately:

a. the name and identification number of each coating and cleanup material employed;

b. the volume, in gallons, of each coating and cleanup material employed;

c. the VOC content of each coating and cleanup material, in pounds per gallon, as applied;

d. the VOC emission rates for each coating and cleanup material [b x c], in pounds; and

e. the total VOC emission rate for all the coatings and cleanup materials, in tons [summation of d for all coatings and cleanup materials, divided by 2000 pounds/ton].

Note: The coating information must be for the coatings, as employed, including any thinning solvents added at the emissions unit.

(3) If a credit for recovered cleaning solution is used to demonstrate compliance and/or used in the rolling, 12-month VOC emission calculations, the permittee shall maintain the following monthly records for the recovered cleaning solution and the recovery drum or tank serving emissions units K002 and K003:

a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off-site;

b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;

c. a record of the VOC content of each cleanup solvent material that is collected for recovery, in pounds/gallon, or a record of the testing results of the VOC content for the material shipped;

d. the mass (pounds) of VOC to be credited to the VOC emissions, from each shipment of recovered material, calculated using the lowest VOC content of any cleanup solvent material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped [(b) x (c)], and the date of each such shipment or record of credit; and

e. the record of the total amount of VOC emissions, in tons, that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility [summation of (d) for each shipment recorded during the month divided by 2000 pounds/ton].

(4) In order to demonstrate compliance with the rolling, 12-month VOC emission limitation, the permittee shall collect and record the following information each month for emissions units K002 and K003 and the natural gas combustion sources, combined:

a. the total monthly VOC emissions, in tons (summation of [d)(1)b.] and [d)(2)e.] for K002 and K003 less any recovered VOC credits from [d)(3)e.]); and

b. the rolling, 12-month summation of the total monthly VOC emission rates, in tons.

(5) In order to demonstrate compliance with the rolling, 12-month HAP emission limitations, the permittee shall collect and record the following information for emissions units K002 and K003, combined:

a. the company identification of each coating employed;

b. the HAP content, in pounds per gallon, of each HAP in each coating and cleanup material employed, as applied;

c. the volume, in gallons, of each coating and cleanup material employed;

d. the emission rate, in pounds, for each HAP from each coating and cleanup material employed [(b) x (c)];

e. the total emission rate, in tons per month, for each HAP from all coatings and cleanup materials employed (summation of (d) for each HAP divided by 2000 pounds/ton, less any recovered HAP credits from [d)(6)c.]);

f. the total HAP emission rate, in tons per month, for the combination of all HAPs from all coatings and cleanup materials employed (summation of (e) divided by 2000 pounds/ton, less any recovered HAP credits from [d)(6)d.]);

g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month, and

h. after the first 12 months of operation under the provisions of this permit, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

(6) If a credit for recovered cleaning solution is used to demonstrate compliance and/or used in the rolling, 12-month HAP emission calculations, the permittee shall maintain the following monthly records for the recovered cleaning solution and the recovery drum or tank serving emissions units K002 and K003, in addition to the information specified in Section d)(3):

a. the percent, by weight, of each individual HAP present in the materials shipped for recycle/recovery and/or disposal at an outside facility; and/or

b. the percent, by weight, of all HAPs present in the materials shipped for recycle/recovery and/or disposal at an outside facility; and

c. the emission rate of each HAP, in tons, that may be applied as a credit for the materials shipped for recycle/recovery and/or disposal at an outside facility [tons VOC emissions that may be applied as a credit [d)(3)e.] multiplied by (a)]; and/or

d. the combined HAP emission rate, in tons, that may be applied as a credit for the materials shipped for recycle/recovery and/or disposal at an outside facility [tons VOC emissions that may be applied as a credit [d)(3)e.] multiplied by (b)].

(7) In order to demonstrate compliance with the 12.85 tons VOC/year limit for emissions unit K003, the permittee shall collect and record each month the annual, year-to-date VOC emissions from all coatings and cleanup materials (summation of [d)(2)e.] for each calendar month-to-date from January to December).

(8) The permittee shall collect and record the following information each day for emissions unit K003:

a. the name and identification number of each coating employed;

b. the volume, in gallons, of each coating employed; and

c. the total volume, in gallons, of all of the coatings employed.

(9) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports, in accordance with the Standard Terms and Conditions of this permit, for emissions units K002 and K003, combined, that identify all exceedances of the rolling, 12-month VOC emission limitation.

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

(3) The permittee shall submit quarterly deviation (excursion) reports, in accordance with the Standard Terms and Conditions of this permit, for emissions units K002 and K003, combined, as follows:

a. For the first 12 calendar months of operation, the permittee shall submit deviation (excursion) reports, which identify any exceedances of the maximum allowable cumulative HAP emission levels specified in Section b)(2)c.

b. After the first 12 calendar months of operation, the permittee shall submit deviation (excursion) reports, which identify any exceedances of the rolling, 12-month HAP emission limitations.

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

f) Testing Requirements

(1) Compliance with the emission limitations specified in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation: 12.85 tons VOC/year

Applicable Compliance Method: The permittee shall demonstrate compliance with this emission limitation in accordance with the record keeping requirements specified in Sections d)(2) and d)(7).

b. Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation in accordance with OAC rule 3745-17-03(B)(1).

c. Emission Limitation: 0.551 pound PE/hour

Applicable Compliance Method: To determine the actual worst case PE rate (E), the following equation may be used for the coating operation:

E = PE rate (lbs/hr)

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

Where:

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used for the spray stations (25% considering 40 CFR 60.313, Table 1), expressed as a fraction

CE = control efficiency of the control equipment (assumed to be 98%), expressed as a fraction

If required, the permittee shall demonstrate compliance with the above limitation in accordance with OAC rule 3745-17-03(B)(10).

d. Emission Limitation: The permittee shall not use more than 10 gallons of coating materials per day for the coating of miscellaneous metal parts.

Applicable Compliance Method: The permittee shall demonstrate compliance with this emission limitation in accordance with the record keeping requirements specified in section d)(8).

e. Emission Limitation: 99.9 tons VOC per rolling, 12-month period, for emissions units K002 and K003 and from natural gas combustion sources at the facility, combined.

Applicable Compliance Method: The permittee shall demonstrate compliance with this emission limitation in accordance with the record keeping requirements specified in sections d)(1), d)(2), d)(3), and d)(4).

f. Emission Limitation: 9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units K002 and K003, combined

Applicable Compliance Method: The permittee shall demonstrate compliance with this emission limitation in accordance with the record keeping requirements specified in Sections d)(5) and d)(6).

(2) Method 24 of 40 CFR Part 60, Appendix A or formulation data shall be used to determine the VOC contents of the coating and cleanup materials.

g) Miscellaneous Requirements

The natural gas combustion sources located at this facility are exempt from any Ohio EPA permitting requirements. However, the exemption provided for in OAC rule 3745-21-09(A)(3)(b)(ii) is inclusive of all VOC emissions at the facility. Therefore, it is necessary for the permittee to maintain accurate records of their VOC emissions from natural gas usage in order for emissions unit K002 to avoid the requirements of OAC rule 3745-2