



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

11/21/2008

Doug Reiff
Steve Reiff, Incorporated
5650 N. 800 S.
South Whitley, IN 46787

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0363000039
Permit Number: P0104016
Permit Type: Renewal
County: Paulding

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, 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

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
Steve Reiff, Incorporated**

Facility ID: 0363000039
Permit Number: P0104016
Permit Type: Renewal
Issued: 11/21/2008
Effective: 11/21/2008
Expiration: 11/21/2013



Air Pollution Permit-to-Install and Operate
for
Steve Reiff, Incorporated

Table of Contents

Authorization 1

A. Standard Terms and Conditions 3

 1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4

 2. Who is responsible for complying with this permit? 4

 3. What records must I keep under this permit? 4

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

 5. When does my PTIO expire, and when do I need to submit my renewal application? 4

 6. What happens to this permit if my project is delayed or I do not install or modify my source? 5

 7. What reports must I submit under this permit? 5

 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? 5

 9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5

 10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6

 11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6

 12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6

 13. Can I transfer this permit to a new owner or operator?..... 6

 14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7

 15. What happens if a portion of this permit is determined to be invalid? 7

B. Facility-Wide Terms and Conditions..... 8

C. Emissions Unit Terms and Conditions 10

 1. F001, Sandblaster..... 11

 2. K001, Paint Booth 14

 3. K002, Paint Booth 22

 4. K003, Paint Booth 30

 5. K004, Paint Booth 38

 6. K005, Paint Booth 46

 7. K006, Paint Booth 54

 8. K007, Paint Booth 62

 9. K008, Paint Booth 71



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate
Permit Number: P0104016
Facility ID: 0363000039
Effective Date: 11/21/2008

Authorization

Facility ID: 0363000039
Application Number(s): A0036222
Permit Number: P0104016
Permit Description: Renewal PTIO (PTI #03-13695 and PTI #03-17364 - Both PTIs are synthetic minor PTIs to avoid MACT and Title V. Both PTIs have already been issued draft.)
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:

Steve Reiff, Incorporated
5196 U.S. Route 24 East
Antwerp, OH 45813

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: P0104016
 Permit Description: Renewal PTIO (PTI #03-13695 and PTI #03-17364 - Both PTIs are synthetic minor PTIs to avoid MACT and Title V. Both PTIs have already been issued draft.)

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

Emissions Unit ID:	F001
Company Equipment ID:	Sandblaster
Superseded Permit Number:	03-13695
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K001
Company Equipment ID:	Paint Booth
Superseded Permit Number:	03-13695
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Paint Booth
Superseded Permit Number:	03-13695
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Paint Booth
Superseded Permit Number:	03-13695
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K004
Company Equipment ID:	Paint Booth
Superseded Permit Number:	03-13695
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K005
Company Equipment ID:	Paint Booth
Superseded Permit Number:	03-13695
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K006
Company Equipment ID:	Paint Booth
Superseded Permit Number:	03-13695
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K007
Company Equipment ID:	Paint Booth
Superseded Permit Number:	03-17364
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K008
Company Equipment ID:	Paint Booth
Superseded Permit Number:	03-17364
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: P0104016

Facility ID: 0363000039

Effective Date: 11/21/2008

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, 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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104016

Facility ID: 0363000039

Effective Date: 11/21/2008

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

Permit Number: P0104016

Facility ID: 0363000039

Effective Date: 11/21/2008

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: P0104016

Facility ID: 0363000039

Effective Date: 11/21/2008

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: P0104016

Facility ID: 0363000039

Effective Date: 11/21/2008

C. Emissions Unit Terms and Conditions



1. F001, Sandblaster

Operations, Property and/or Equipment Description:

Sandblasting operations

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)	1.62 tons particulate emissions (PE)/yr Visible particulate emissions shall not exceed 20% opacity as a three-minute average from enclosure. See b)(2)a.
b.	OAC rule 3745-17-08(A)	See b)(2)b.
c.	OAC rule 3745-17-07(B)(1)	See b)(2)c.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the following:

i. all sandblasting operations shall be conducted within a total enclosure; and



- ii. upon completion of daily sandblasting operations, the company shall clean up and properly dispose of all sandblasting wastes to prevent the material from becoming airborne.
 - b. Steve Reiff, Inc. is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08 (A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08 (B)(1).
 - c. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07 (B)(11)(e).
 - c) Operational Restrictions
 - (1) The maximum annual abrasive material usage in this emission unit shall not exceed 240 tons.
 - d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

 - (2) The permittee shall collect and record the following information for the abrasive material usage in emissions unit F001:



- a. the monthly abrasive material usage employed, in tons per month; and
 - b. the annual, year to date abrasive material usage employed (sum of (a) for each calendar month to date from January to December), in tons per year.
- e) Reporting Requirements
- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitations specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 1.62 tons PE/yr

Applicable Compliance Method: The emission limitation was established by applying a 75% control efficiency for use of a total enclosure to an uncontrolled emission rate of 6.84 tons per year. The uncontrolled emission rate was determined by multiplying the restricted throughput of abrasive material of 240 tons per year (480,000 lbs) by the appropriate emission factor emission factor from AP-42 Chapter 13.2.6 (9/97) (27 tons PE/1000 lbs of abrasive material). Therefore, provided compliance is shown with the restricted abrasive material throughput, compliance with the annual emission limitation will be assumed.
 - b. Emission Limitation: Visible particulate emissions shall not exceed 20% opacity as a three-minute average from enclosure

Applicable Compliance Method: If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.
- g) Miscellaneous Requirements
- (1) None.



2. K001, Paint Booth

Operations, Property and/or Equipment Description:

Paint Booth 1

- 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. b)(2)b., c)(1), d)(2), d)(4) and e)(1).
 - (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. d)(5) and d)(6).
- 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)	10.50 lbs organic compounds (OC)/hr from coating operations 1,293.75 lbs OC/month and 7.76 tons OC/yr from cleanup operations [for emission units K001, K002, K003, K004, K005, and K006, combined] See b)(2)a.
b.	OAC rule 3745-31-05(D)	27.72 tons of OC per rolling, 12-month period from coating operations [for emission units K001, K002, K003, K004, K005, and K006 combined] [See b)(2)b.i. and c)(1)] 9.15 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 22.23 tons per rolling, 12-month period for any combination of HAPs [for emission units from K001, K002, K003, K004, K005, and K006]



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		combined] [See b)(2)b.ii.]
c.	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating
d.	OAC rule 3745-17-11(C)	See b)(1)d.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 27.72 tons OC per rolling, 12-month period based on coating usage restrictions for emission units K001, K002, K003, K004, K005 and K006, combined [See c)(1)]. For purposes of federal enforceability a limitation on OC effectively restricts VOC.
 - ii. Annual HAP emissions from emissions units K001, K002, K003, K004, K005 and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.
- c. The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.
- d. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

c) Operational Restrictions

- (1) The maximum annual coating usage rate for emissions units K001, K002, K003, K004, K005, and K006 combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.
- (2) The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all the coatings employed in this emissions unit:



- a. the name and identification number of each coating employed; and
 - b. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$].
- (2) The permittee shall collect and record the following information each month for all the coatings employed for emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the name and identification number of each coating employed;
 - b. the OC content of each coating, as applied, in pounds per gallon;
 - c. the number of gallons of each coating employed;
 - d. the total number of gallons of all the coatings employed (summation of d)(2)c. for all coatings);
 - e. the rolling, 12-month coatings usage rates, in gallons;
 - f. the OC emission rate for each coating employed [d)(2)b. x d)(2)c.], in pounds;
 - g. the total OC emission rate for all the coatings employed (summation of d)(2)f. for all coatings.), in pounds or tons;
 - h. the rolling, 12-month OC emission rates, in tons; and
 - i. the rolling, 12-month coatings usage rate, in gallons.

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

- (3) The permittee shall collect and record the following each month for cleanup operations in emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material employed, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC emissions from each cleanup material employed [d)(3)b. x d)(3)c.];
 - e. the total OC emissions from all the cleanup materials employed (summation of d)(3)d. for all cleanup materials) in pounds or tons; and



- f. the annual year to date VOC emissions from the cleanup operations, in tons per year (summation of d)(3)e. for each calendar month to date from January to December).
- (4) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the company identification of each coating and cleanup material employed;
 - b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(4)b. x d)(4)c.] for each individual HAP, in lbs;
 - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d)(4)d. for all coatings and cleanup materials), in lbs;
 - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of d)(4)e. for all HAPs for all coatings and cleanup materials), in lbs;
 - g. the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
 - h. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
- (5) The permit to install for emission unit K001, K002, K003, K004, K005, and K006 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each 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 these emission units 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: Toluene
 TLV (mg/m3): 188.405
 Maximum Hourly Emission Rate (lbs/hr): 10.50 per emission unit (63 lbs/hr total)
 Predicted 1-Hour Maximum Ground-Level
 Concentration (µg/m3): 1198.2
 MAGLC (µg/m3): 4485.8

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 compositions 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

- (6) The permittee shall collect, record, and retain the following information when it conducts evaluation 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.
- (7) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a)]



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

[OAC rule 3745-17-11(C)(2)(c)]

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

[OAC rule 3745-17-11(C)(2)(c)]

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

- a. the date of the inspection;
- b. a description of each/any problem identified and the date it was corrected;
- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-17-11(C)(2)(d) and (f)]

- (11) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer=s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C)(2)(f) and (g)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the rolling, 12-month OC emission limitation of 27.72 tons.



- b. All exceedances of the monthly OC emission limitation of 1,293.75 pounds (from the cleanup operations for emissions units K001, K002, K003, K004, K005, and K006, combined).
- c. All exceedances of the rolling, 12-month coatings usage restriction of 15,840 gallons (for emissions units K001, K002, K003, K004, K005, and K006, combined).
- d. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.15 tons and 22.23 tons, respectively (for emissions units K001, K002, K003, K004, K005, and K006, combined).

These reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

- (2) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 3.50 lbs of VOC/gallon of coating, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
- (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 these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 10.50 lbs OC/hr from coatings usage

Applicable Compliance Method: The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (3.0 gallons per hour) by the maximum OC content of all the coatings (3.50 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

- b. Emission Limitation: 1,293.75 lbs OC/month and 7.76 tons OC/yr from the cleanup operations (for emissions units K001, K002, K003, K004, K005, and K006, combined)

Applicable Compliance Method: Compliance with the monthly and annual allowable OC emission limitations above shall be based upon the record keeping requirements specified in section d)(3) of this permit.



- c. Emission Limitation: 27.72 tons of OC per rolling, 12-month period, from coatings usage

Applicable Compliance Method: Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in section d)(2) of this permit.

- d. Emission Limitation: Annual HAP emissions from emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section d)(4) of this permit.

- e. Emission Limitation: 3.50 pounds VOC per gallon of coating, as applied

Applicable Compliance Method: Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section d)(1) of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

- f. Emission Limitation: The maximum annual coatings usage rate for emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rates.

Applicable Compliance Method: Compliance with the annual allowable coatings usage restriction above shall be based upon the record keeping requirements specified in section d)(2) of this permit.

g) Miscellaneous Requirements

- (1) None.



3. K002, Paint Booth

Operations, Property and/or Equipment Description:

Paint Booth 2

- 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. b)(2)b., c)(1), d)(2), d)(4) and e)(1).
 - (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. d)(5) and d)(6).
- 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)	10.50 lbs organic compounds (OC)/hr from coating operations 1,293.75 lbs OC/month and 7.76 tons OC/yr and from cleanup operations [for emission units K001, K002, K003, K004, K005, and K006, combined] 27.72 tons of OC per rolling, 12-month period from coating operations [for emission units K001, K002, K003, K004, K005, and K006 combined] [See b)(2)b.i. and c)(1)] See b)(2)a.
b.	OAC rule 3745-31-05(D)	9.15 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 22.23 tons per rolling, 12-month period for any combination of HAPs [for emission units from K001, K002, K003, K004, K005, and K006



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		combined] [See b)(2)b.ii.]
c.	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating.
d.	OAC rule 3745-17-11(C)	See b)(1)d.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 27.72 tons OC per rolling, 12-month period based on coating usage restrictions for emission units K001, K002, K003, K004, K005 and K006, combined (See c)(1)). For purposes of federal enforceability a limitation on OC effectively restricts VOC.
 - ii. Annual HAP emissions from emissions units K001, K002, K003, K004, K005 and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.
- c. The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

c) Operational Restrictions

- (1) The maximum annual coating usage rate for emissions units K001, K002, K003, K004, K005, and K006 combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all the coatings employed in this emissions unit:
 - a. the name and identification number of each coating employed; and
 - b. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$].



- (2) The permittee shall collect and record the following information each month for all the coatings employed for emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the name and identification number of each coating employed;
 - b. the OC content of each coating, as applied, in pounds per gallon;
 - c. the number of gallons of each coating employed;
 - d. the total number of gallons of all the coatings employed (summation of d)(2)c. for all coatings);
 - e. the rolling, 12-month coatings usage rates, in gallons;
 - f. the OC emission rate for each coating employed $[d)(2)b. \times d)(2)c.]$, in pounds;
 - g. the total OC emission rate for all the coatings employed (summation of d)(2)f. for all coatings.), in pounds or tons;
 - h. the issuance of this permit, the rolling, 12-month OC emission rates, in tons; and
 - i. the rolling, 12-month coatings usage rate, in gallons.

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

- (3) The permittee shall collect and record the following each month for cleanup operations in emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material employed, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC emissions from each cleanup material employed $[d)(3)b. \times d)(3)c.]$;
 - e. the total OC emissions from all the cleanup materials employed (summation of d)(3)d. for all cleanup materials) in pounds or tons; and
 - f. the annual year to date VOC emissions from the cleanup operations, in tons per year (summation of d)(3)e. for each calendar month to date from January to December).
- (4) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the company identification of each coating and cleanup material employed;



- b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(4)b. x d)(4)c.] for each individual HAP, in lbs;
 - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d)(4)d. for all coatings and cleanup materials), in lbs;
 - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of d)(4)e. for all HAPs for all coatings and cleanup materials), in lbs;
- (5) The permit to install for emission unit K001, K002, K003, K004, K005, and K006 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each 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 these emission units 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: Toluene
 TLV (mg/m3): 188.405
 Maximum Hourly Emission Rate (lbs/hr): 10.50 per emission unit (63 lbs/hr total)
 Predicted 1-Hour Maximum Ground-Level
 Concentration (µg/m3): 1198.2
 MAGLC (µg/m3): 4485.8

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 compositions 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

- (6) The permittee shall collect, record, and retain the following information when it conducts evaluation 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.
- (7) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a)]

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

[OAC rule 3745-17-11(C)(2)(c)]

- (9) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter



while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c)]

- (10) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-17-11(C)(2)(d) and (f)]

- (11) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C)(2)(f) and (g)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. All exceedances of the rolling, 12-month OC emission limitation of 27.72 tons.
 - b. All exceedances of the monthly OC emission limitation of 1,293.75 pounds (from the cleanup operations for emissions units K001, K002, K003, K004, K005, and K006, combined).
 - c. All exceedances of the rolling, 12-month coatings usage restriction of 15,840 gallons (for emissions units K001, K002, K003, K004, K005, and K006, combined).
 - d. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.15 tons and 22.23 tons, respectively (for emissions units K001, K002, K003, K004, K005, and K006, combined).

These reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.



- (2) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 3.50 lbs of VOC/gallon of coating, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
 - (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 these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 10.50 lbs OC/hr, from coatings usage

Applicable Compliance Method: The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (3.0 gallons per hour) by the maximum OC content of all the coatings (3.50 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.
 - b. Emission Limitation: 1,293.75 lbs OC/month and 7.76 tons OC/yr from the cleanup operations (for emissions units K001, K002, K003, K004, K005, and K006, combined)

Applicable Compliance Method: Compliance with the monthly and annual allowable OC emission limitations above shall be based upon the record keeping requirements specified in section d)(3) of this permit.
 - c. Emission Limitation: 27.72 tons of OC per rolling, 12-month period, from coatings usage

Applicable Compliance Method: Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in section d)(2) of this permit.
 - d. Emission Limitation: Annual HAP emissions from emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.



Applicable Compliance Method: Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section d)(4) of this permit.

- e. Emission Limitation: 3.50 pounds VOC per gallon of coating, as applied

Applicable Compliance Method: Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section d)(1) of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

- f. Emission Limitation: The maximum annual coatings usage rate for emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rates.

Applicable Compliance Method: Compliance with the annual allowable coatings usage restriction above shall be based upon the record keeping requirements specified in section d)(2) of this permit.

- g) Miscellaneous Requirements

- (1) None.



4. K003, Paint Booth

Operations, Property and/or Equipment Description:

Paint Booth 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. b)(2)b., c)(1), d)(2), d)(4), and e)(1).
 - (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. d)(5) and d)(6).
- 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)	10.50 lbs organic compounds (OC)/hr from coating operations 1,293.75 lbs OC/month and 7.76 tons OC/yr from cleanup operations [for emission units K001, K002, K003, K004, K005, and K006, combined] 27.72 tons of OC per rolling, 12-month period from coating operations [for emission units K001, K002, K003, K004, K005, and K006 combined] [See b)(2)b.i. and c)(1)] See b)(2)a.
b.	OAC rule 3745-31-05(D)	9.15 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 22.23 tons per rolling, 12-month period for any combination of HAPs [for emission units from K001, K002, K003, K004, K005, and K006



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		combined] [See b)(2)b.ii.]
c.	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating
d.	OAC rule 3745-17-11(C)	See b)(1)d.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 27.72 tons OC per rolling, 12-month period based on coating usage restrictions for emission units K001, K002, K003, K004, K005 and K006, combined [See c)(1)]. For purposes of federal enforceability a limitation on OC effectively restricts VOC.
 - ii. Annual HAP emissions from emissions units K001, K002, K003, K004, K005 and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.
- c. The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

c) Operational Restrictions

- (1) The maximum annual coating usage rate for emissions units K001, K002, K003, K004, K005, and K006 combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all the coatings employed in this emissions unit:
 - a. the name and identification number of each coating employed; and
 - b. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$].



- (2) The permittee shall collect and record the following information each month for all the coatings employed for emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the name and identification number of each coating employed;
 - b. the OC content of each coating, as applied, in pounds per gallon;
 - c. the number of gallons of each coating employed;
 - d. the total number of gallons of all the coatings employed (summation of d)(2)c. for all coatings);
 - e. the rolling, 12-month coatings usage rates, in gallons;
 - f. the OC emission rate for each coating employed $[d)(2)b. \times d)(2)c.]$, in pounds;
 - g. the total OC emission rate for all the coatings employed (summation of d)(2)f. for all coatings.), in pounds or tons;
 - h. the rolling, 12-month OC emission rates, in tons.
 - i. the cumulative coatings usage rate, in gallons; and
 - j. the rolling, 12-month coatings usage rate, in gallons.

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

- (3) The permittee shall collect and record the following each month for cleanup operations in emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material employed, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC emissions from each cleanup material employed $[d)(3)b. \times d)(3)c.]$;
 - e. the total OC emissions from all the cleanup materials employed (summation of d)(3)d. for all cleanup materials) in pounds or tons; and
 - f. the annual year to date VOC emissions from the cleanup operations, in tons per year (summation of d)(3)e. for each calendar month to date from January to December).
- (4) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the company identification of each coating and cleanup material employed;



- b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(4)b. x d)(4)c.] for each individual HAP, in lbs;
 - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d)(4)d. for all coatings and cleanup materials), in lbs;
 - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of d)(4)e. for all HAPs for all coatings and cleanup materials), in lbs;
- (5) The permit to install for emission unit K001, K002, K003, K004, K005, and K006 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each 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 these emission units 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: Toluene

TLV (mg/m³): 188.405

Maximum Hourly Emission Rate (lbs/hr): 10.50 per emission unit (63 lbs/hr total)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m³): 1198.2

MAGLC (ug/m³): 4485.8

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 compositions 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

- (6) The permittee shall collect, record, and retain the following information when it conducts evaluation 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.
- (7) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a)]

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

[OAC rule 3745-17-11(C)(2)(c)]

- (9) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter



while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c)]

- (10) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-17-11(C)(2)(d) and (f)]

- (11) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C)(2)(f) and (g)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the rolling, 12-month OC emission limitation of 27.72 tons.
 - b. All exceedances of the monthly OC emission limitation of 1,293.75 pounds (from the cleanup operations for emissions units K001, K002, K003, K004, K005, and K006, combined).
 - c. All exceedances of the rolling, 12-month coatings usage restriction of 15,840 gallons (for emissions units K001, K002, K003, K004, K005, and K006, combined).
 - d. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.15 tons and 22.23 tons, respectively (for emissions units K001, K002, K003, K004, K005, and K006, combined).

These reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.



- (2) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 3.50 lbs of VOC/gallon of coating, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
 - (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 these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 10.50 lbs OC/hr from coatings usage

Applicable Compliance Method: The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (3.0 gallons per hour) by the maximum OC content of all the coatings (3.50 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.
 - b. Emission Limitation: 1,293.75 lbs OC/month and 7.76 tons OC/yr from the cleanup operations (for emissions units K001, K002, K003, K004, K005, and K006, combined)

Applicable Compliance Method: Compliance with the monthly and annual allowable OC emission limitations above shall be based upon the record keeping requirements specified in section d)(3) of this permit.
 - c. Emission Limitation: 27.72 tons of OC per rolling, 12-month period from coatings usage

Applicable Compliance Method: Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in section d)(2) of this permit.
 - d. Emission Limitation: Annual HAP emissions from emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.



Applicable Compliance Method: Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section d)(4) of this permit.

- e. Emission Limitation: 3.50 pounds VOC per gallon of coating, as applied

Applicable Compliance Method: Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section d)(1) of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

- f. Emission Limitation: The maximum annual coatings usage rate for emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rates.

Applicable Compliance Method: Compliance with the annual allowable coatings usage restriction above shall be based upon the record keeping requirements specified in section d)(2) of this permit.

- g) Miscellaneous Requirements

- (1) None.



5. K004, Paint Booth

Operations, Property and/or Equipment Description:

Paint 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. b)(2)b., c)(1), d)(2), d)(4), and e)(1).
 - (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. d)(5) and d)(6).
- 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)	10.50 lbs organic compounds (OC)/hr from coating operations 1,293.75 lbs OC/month and 7.76 tons OC/yr from cleanup operations [for emission units K001, K002, K003, K004, K005, and K006, combined] 27.72 tons of OC per rolling, 12-month period from coating operations [for emission units K001, K002, K003, K004, K005, and K006 combined] [See b)(2)b.i. and c)(1)] See b)(2)a.
b.	OAC rule 3745-31-05(D)	9.15 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 22.23 tons per rolling, 12-month period for any combination of HAPs [for emission units from K001, K002, K003, K004, K005, and K006]



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		combined] [See b)(2)b.ii.]
c.	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating
d.	OAC rule 3745-17-11(C)	See b)(1)d.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 27.72 tons OC per rolling, 12-month period based on coating usage restrictions for emission units K001, K002, K003, K004, K005 and K006, combined [See c)(1)]. For purposes of federal enforceability a limitation on OC effectively restricts VOC.
 - ii. Annual HAP emissions from emissions units K001, K002, K003, K004, K005 and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.
- c. The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

c) Operational Restrictions

- (1) The maximum annual coating usage rate for emissions units K001, K002, K003, K004, K005, and K006 combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

a) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all the coatings employed in this emissions unit:
 - a. the name and identification number of each coating employed; and
 - b. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$].



- (2) The permittee shall collect and record the following information each month for all the coatings employed for emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the name and identification number of each coating employed;
 - b. the OC content of each coating, as applied, in pounds per gallon;
 - c. the number of gallons of each coating employed;
 - d. the total number of gallons of all the coatings employed (summation of d)(2)c. for all coatings);
 - e. the rolling, 12-month coatings usage rates, in gallons;
 - f. the OC emission rate for each coating employed $[d)(2)b. \times d)(2)c.]$, in pounds;
 - g. the total OC emission rate for all the coatings employed (summation of d)(2)f. for all coatings.), in pounds or tons;
 - h. the rolling, 12-month OC emission rates, in tons; and
 - i. the rolling, 12-month coatings usage rate, in gallons.

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

- (3) The permittee shall collect and record the following each month for cleanup operations in emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material employed, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC emissions from each cleanup material employed $[d)(3)b. \times d)(3)c.]$;
 - e. the total OC emissions from all the cleanup materials employed (summation of d)(3)d. for all cleanup materials) in pounds or tons; and
 - f. the annual year to date VOC emissions from the cleanup operations, in tons per year (summation of d)(3)e. for each calendar month to date from January to December).
- (4) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the company identification of each coating and cleanup material employed;



- b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(4)b. x d)(4)c.] for each individual HAP, in lbs;
 - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d)(4)d. for all coatings and cleanup materials), in lbs;
 - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of d)(4)e. for all HAPs for all coatings and cleanup materials), in lbs;
- (5) The permit to install for emission unit K001, K002, K003, K004, K005, and K006 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each 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 these emission units 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: Toluene

TLV (mg/m³): 188.405

Maximum Hourly Emission Rate (lbs/hr): 10.50 per emission unit (63 lbs/hr total)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m³): 1198.2

MAGLC (ug/m³): 4485.8

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 compositions 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

- (6) The permittee shall collect, record, and retain the following information when it conducts evaluation 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.
- (7) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a)]

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

[OAC rule 3745-17-11(C)(2)(c)]

- (9) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter



while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c)]

- (10) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-17-11(C)(2)(d) and (f)]

- (11) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C)(2)(f) and (g)]

b) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the rolling, 12-month OC emission limitation of 27.72 tons.
 - b. All exceedances of the monthly OC emission limitation of 1,293.75 pounds (from the cleanup operations for emissions units K001, K002, K003, K004, K005, and K006, combined).
 - c. All exceedances of the rolling, 12-month coatings usage restriction of 15,840 gallons (for emissions units K001, K002, K003, K004, K005, and K006, combined).
 - d. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.15 tons and 22.23 tons, respectively (for emissions units K001, K002, K003, K004, K005, and K006, combined).

These reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.



- (2) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 3.50 lbs of VOC/gallon of coating, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
 - (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.
- c) Testing Requirements
- (1) Compliance with the emission limitations specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 10.50 lbs OC/hr, from coatings usage

Applicable Compliance Method: The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (3.0 gallons per hour) by the maximum OC content of all the coatings (3.50 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.
 - b. Emission Limitation: 1,293.75 lbs OC/month and 7.76 tons OC/yr from the cleanup operations (for emissions units K001, K002, K003, K004, K005, and K006, combined)

Applicable Compliance Method: Compliance with the monthly and annual allowable OC emission limitations above shall be based upon the record keeping requirements specified in section d)(3) of this permit.
 - c. Emission Limitation: 27.72 tons of OC per rolling, 12-month period, from coatings usage

Applicable Compliance Method: Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in section d)(2) of this permit.
 - d. Emission Limitation: Annual HAP emissions from emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.



Applicable Compliance Method: Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section d)(4) of this permit.

- e. Emission Limitation: 3.50 pounds VOC per gallon of coating, as applied

Applicable Compliance Method: Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section d)(1) of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

- f. Emission Limitation: The maximum annual coatings usage rate for emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rates.

Applicable Compliance Method: Compliance with the annual allowable coatings usage restriction above shall be based upon the record keeping requirements specified in section d)(2) of this permit.

- d) Miscellaneous Requirements

- (1) None.



6. K005, Paint Booth

Operations, Property and/or Equipment Description:

Paint Booth 5

- 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. b)(2)b., c)(1), d)(2), d)(4), and e)(1).
 - (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. d)(5) and d)(6).
- 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)	10.50 lbs organic compounds (OC)/hr from coating operations 1,293.75 lbs OC/month and 7.76 tons OC/yr from cleanup operations [for emission units K001, K002, K003, K004, K005, and K006, combined] 27.72 tons of OC per rolling, 12-month period from coating operations [for emission units K001, K002, K003, K004, K005, and K006 combined] [See b)(2)b.i. and c)(1)] See b)(2)a.
b.	OAC rule 3745-31-05(D)	9.15 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 22.23 tons per rolling, 12-month period for any combination of HAPs [for emission units from K001, K002, K003, K004, K005, and K006



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		combined] [See b)(2)b.ii.]
c.	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating
d.	OAC rule 3745-17-11(C)	See b)(1)d.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 27.72 tons OC per rolling, 12-month period based on coating usage restrictions for emission units K001, K002, K003, K004, K005 and K006, combined [See c)(1)]. For purposes of federal enforceability a limitation on OC effectively restricts VOC.
 - ii. Annual HAP emissions from emissions units K001, K002, K003, K004, K005 and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.
- c. The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

c) Operational Restrictions

- (1) The maximum annual coating usage rate for emissions units K001, K002, K003, K004, K005, and K006 combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all the coatings employed in this emissions unit:
 - a. the name and identification number of each coating employed; and
 - b. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$].



- (2) The permittee shall collect and record the following information each month for all the coatings employed for emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the name and identification number of each coating employed;
 - b. the OC content of each coating, as applied, in pounds per gallon;
 - c. the number of gallons of each coating employed;
 - d. the total number of gallons of all the coatings employed (summation of d)(2)c. for all coatings);
 - e. the rolling, 12-month coatings usage rates, in gallons;
 - f. the OC emission rate for each coating employed $[d)(2)b. \times d)(2)c.]$, in pounds;
 - g. the total OC emission rate for all the coatings employed (summation of d)(2)f. for all coatings.), in pounds or tons;
 - h. the rolling, 12-month OC emission rates, in tons.
 - i. the rolling, 12-month coatings usage rate, in gallons.

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

- (3) The permittee shall collect and record the following each month for cleanup operations in emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material employed, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC emissions from each cleanup material employed $[d)(3)b. \times d)(3)c.]$;
 - e. the total OC emissions from all the cleanup materials employed (summation of d)(3)d. for all cleanup materials) in pounds or tons; and
 - f. the annual year to date VOC emissions from the cleanup operations, in tons per year (summation of d)(3)e. for each calendar month to date from January to December).
- (4) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the company identification of each coating and cleanup material employed;



- b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(4)b. x d)(4)c.] for each individual HAP, in lbs;
 - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d)(4)d. for all coatings and cleanup materials), in lbs;
 - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of d)(4)e. for all HAPs for all coatings and cleanup materials), in lbs;
- (5) The permit to install for emission unit K001, K002, K003, K004, K005, and K006 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each 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 these emission units 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: Toluene

TLV (mg/m³): 188.405

Maximum Hourly Emission Rate (lbs/hr): 10.50 per emission unit (63 lbs/hr total)

Predicted 1-Hour Maximum Ground-Level

Concentration (µg/m³): 1198.2

MAGLC (µg/m³): 4485.8

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 compositions 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

- (6) The permittee shall collect, record, and retain the following information when it conducts evaluation 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.
- (7) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a)]

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

[OAC rule 3745-17-11(C)(2)(c)]

- (9) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter



while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c)]

- (10) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-17-11(C)(2)(d) and (f)]

- (11) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C)(2)(f) and (g)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the rolling, 12-month OC emission limitation of 27.72 tons.
 - b. All exceedances of the monthly OC emission limitation of 1,293.75 pounds (from the cleanup operations for emissions units K001, K002, K003, K004, K005, and K006, combined).
 - c. All exceedances of the rolling, 12-month coatings usage restriction of 15,840 gallons (for emissions units K001, K002, K003, K004, K005, and K006, combined).
 - d. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.15 tons and 22.23 tons, respectively (for emissions units K001, K002, K003, K004, K005, and K006, combined).

These reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.



- (2) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 3.50 lbs of VOC/gallon of coating, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
 - (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 these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 10.50 lbs OC/hr, from coatings usage

Applicable Compliance Method: The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (3.0 gallons per hour) by the maximum OC content of all the coatings (3.50 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.
 - b. Emission Limitation: 1,293.75 lbs OC/month and 7.76 tons OC/yr from the cleanup operations (for emissions units K001, K002, K003, K004, K005, and K006, combined)

Applicable Compliance Method: Compliance with the monthly and annual allowable OC emission limitations above shall be based upon the record keeping requirements specified in section d)(3) of this permit.
 - c. Emission Limitation: 27.72 tons of OC per rolling, 12-month period from coatings usage

Applicable Compliance Method: Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in section d)(2) of this permit.
 - d. Emission Limitation: Annual HAP emissions from emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.



Applicable Compliance Method: Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section d)(4) of this permit.

- e. Emission Limitation: 3.50 pounds VOC per gallon of coating, as applied

Applicable Compliance Method: Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section d)(1) of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

- f. Emission Limitation: The maximum annual coatings usage rate for emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rates.

Applicable Compliance Method: Compliance with the annual allowable coatings usage restriction above shall be based upon the record keeping requirements specified in section d)(2) of this permit.

- g) Miscellaneous Requirements

- (1) None.



7. K006, Paint Booth

Operations, Property and/or Equipment Description:

Paint Booth 6

- 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. B)(2)b., c)(1), d)(2), d)(4), and e)(1).
 - (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. d)(5) and d)(6).
- 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)	10.50 lbs organic compounds (OC)/hr from coating operations 1,293.75 lbs OC/month and 7.76 tons OC/yr from cleanup operations [for emission units K001, K002, K003, K004, K005, and K006, combined] 27.72 tons of OC per rolling, 12-month period from coating operations [for emission units K001, K002, K003, K004, K005, and K006 combined] [See b)(2)b.i. and c)(1)] See b)(2)a.
b.	OAC rule 3745-31-05(D)	9.15 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 22.23 tons per rolling, 12-month period for any combination of HAPs [for emission units from K001, K002, K003, K004, K005, and K006]



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		combined] [See b)(2)b.ii.]
c.	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating
d.	OAC rule 3745-17-11(C)	See b)(1)d.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 27.72 tons OC per rolling, 12-month period based on coating usage restrictions for emission units K001, K002, K003, K004, K005 and K006, combined [See c)(1)]. For purposes of federal enforceability a limitation on OC effectively restricts VOC.
 - ii. Annual HAP emissions from emissions units K001, K002, K003, K004, K005 and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.
- c. The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

c) Operational Restrictions

- (1) The maximum annual coating usage rate for emissions units K001, K002, K003, K004, K005, and K006 combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

a) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all the coatings employed in this emissions unit:
 - a. the name and identification number of each coating employed; and
 - b. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$].



- (2) The permittee shall collect and record the following information each month for all the coatings employed for emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the name and identification number of each coating employed;
 - b. the OC content of each coating, as applied, in pounds per gallon;
 - c. the number of gallons of each coating employed;
 - d. the total number of gallons of all the coatings employed (summation of d)(2)c. for all coatings);
 - e. the rolling, 12-month coatings usage rates, in gallons;
 - f. the OC emission rate for each coating employed $[d)(2)b. \times d)(2)c.]$, in pounds;
 - g. the total OC emission rate for all the coatings employed (summation of d)(2)f. for all coatings.), in pounds or tons;
 - h. the rolling, 12-month OC emission rates, in tons; and
 - i. the rolling, 12-month coatings usage rate, in gallons.

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

- (3) The permittee shall collect and record the following each month for cleanup operations in emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material employed, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC emissions from each cleanup material employed $[d)(3)b. \times d)(3)c.]$;
 - e. the total OC emissions from all the cleanup materials employed (summation of d)(3)d. for all cleanup materials) in pounds or tons; and
 - f. the annual year to date VOC emissions from the cleanup operations, in tons per year (summation of d)(3)e. for each calendar month to date from January to December).
- (4) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the company identification of each coating and cleanup material employed;



- b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(4)b. x d)(4)c.] for each individual HAP, in lbs;
 - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d)(4)d. for all coatings and cleanup materials), in lbs;
 - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of d)(4)e. for all HAPs for all coatings and cleanup materials), in lbs;
- (5) The permit to install for emission unit K001, K002, K003, K004, K005, and K006 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each 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 these emission units 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: Toluene
 TLV (mg/m3): 188.405
 Maximum Hourly Emission Rate (lbs/hr): 10.50 per emission unit (63 lbs/hr total)
 Predicted 1-Hour Maximum Ground-Level
 Concentration (µg/m3): 1198.2
 MAGLC (µg/m3): 4485.8

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 compositions 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

- (6) The permittee shall collect, record, and retain the following information when it conducts evaluation 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.
- (7) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a)]

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

[OAC rule 3745-17-11(C)(2)(c)]

- (9) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter



while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c)]

- (10) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-17-11(C)(2)(d) and (f)]

- (11) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C)(2)(f) and (g)]

b) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. All exceedances of the rolling, 12-month OC emission limitation of 27.72 tons.
 - b. All exceedances of the monthly OC emission limitation of 1,293.75 pounds (from the cleanup operations for emissions units K001, K002, K003, K004, K005, and K006, combined).
 - c. All exceedances of the rolling, 12-month coatings usage restriction of 15,840 gallons (for emissions units K001, K002, K003, K004, K005, and K006, combined).
 - d. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.15 tons and 22.23 tons, respectively (for emissions units K001, K002, K003, K004, K005, and K006, combined).

These reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.



- (2) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 3.50 lbs of VOC/gallon of coating, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
 - (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.
- c) Testing Requirements
- (1) Compliance with the emission limitations specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 10.50 lbs OC/hr, from coatings usage

Applicable Compliance Method: The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (3.0 gallons per hour) by the maximum OC content of all the coatings (3.50 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.
 - b. Emission Limitation: 1,293.75 lbs OC/month and 7.76 tons OC/yr from the cleanup operations (for emissions units K001, K002, K003, K004, K005, and K006, combined)

Applicable Compliance Method: Compliance with the monthly and annual allowable OC emission limitations above shall be based upon the record keeping requirements specified in section d)(3) of this permit.
 - c. Emission Limitation: 27.72 tons of OC per rolling, 12-month period from coatings usage

Applicable Compliance Method: Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in section d)(2) of this permit.
 - d. Emission Limitation: Annual HAP emissions from emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.



Applicable Compliance Method: Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section d)(4) of this permit.

- e. Emission Limitation: 3.50 pounds VOC per gallon of coating, as applied

Applicable Compliance Method: Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section d)(1) of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

- f. Emission Limitation: The maximum annual coatings usage rate for emissions units K001, K002, K003, K004, K005, and K006, combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rates.

Applicable Compliance Method: Compliance with the annual allowable coatings usage restriction above shall be based upon the record keeping requirements specified in section d)(2) of this permit.

d) Miscellaneous Requirements

- (1) None.



8. K007, Paint Booth

Operations, Property and/or Equipment Description:

miscellaneous metal parts coating operation (Paint Booth no. 7)

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. b)(2)d., d)(5), d)(6), d)(7) and d)(8).

(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. d)(5) through d)(8).

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)(b)	See b)(2)a.
b.	OAC rule 3745-31-05(D)	27.72 tons of OC per rolling, 12-month period from coating operations [for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined] [See b)(2)b.i. and c)(1)]. 1,293.75 lbs OC/month and 7.76 tons OC/yr from cleanup operations [for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined] 9.15 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 22.23 tons per rolling, 12-month period for any combination of HAPs [for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined] [See b)(2)b.ii.].
c.	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(C)	See c)(2) and d)(9)
e.	ORC 3704.03(F) and OAC rule 3745-114-01	See b)(2)c.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC and PE emissions from this air contaminant source since the uncontrolled potential to emit for VOC and PE are less than 10 tons per year.
- b. This permit establishes the following federally enforceable emissions limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 27.72 tons OC per rolling, 12-month period based on coating usage restrictions for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined [See c)(1)]. For purposes of federally enforceability a limitation on OC effectively restricts VOC.
 - ii. Annual HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.
- c. In order to demonstrate compliance with the "Toxic Air Contaminant Statute", the Director has established, per ORC 3704.03(F)(4)(c), a limit for 1,6 - hexamethylene diisocyanate, which shall not exceed 0.224 pounds per day. This daily allowable emissions rate was calculated by multiplying the approved daily operating schedule submitted in the permit application (16 hours per day), by the emission rate modeled (0.014 lbs/hour) to determine the ground level concentration.

c) Operational Restrictions

- (1) The maximum annual coating usage rate for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.
- (2) Any surface coating process not exempt under paragraphs (A)(1)(h) to (A)(1)(l) of OAC rule 3745-17-11 shall be controlled by a dry particulate filter, water-wash, or equivalent control device or devices.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all the coatings employed in this emissions unit:



- a. the name and identification number of each coating employed; and
 - b. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$].
- (2) The permittee shall collect and record the following information each month for all the coatings employed for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined:
- a. the name and identification number of each coating employed;
 - b. the OC content of each coating, as applied, in pounds per gallon;
 - c. the number of gallons of each coating employed;
 - d. the total number of gallons of all the coatings employed (summation of d)(2)c. for all coatings);
 - e. the rolling, 12-month coatings usage rates, in gallons;
 - f. the OC emissions rate for each coating employed [d)(2)b. x d)(2)c.], in pounds;
 - g. the total OC emissions rate for all the coatings employed (summation of d)(2)f. for all coatings), in pounds or tons;
 - h. the rolling 12-month OC emissions rate, in tons; and
 - i. the rolling 12-month coatings usage rate, in gallons.
- (3) The permittee shall collect and record the following each month for cleanup operations in emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined:
- a. the name and identification number of each cleanup material employed;
 - b. the OC content of each cleanup material employed, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC emissions from each cleanup material employed [d)(3)b. x d)(3)c.];
 - e. the total OC emissions from all the cleanup materials employed (summation of d)(3)d. for each calendar month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off site for disposal or reclamation [minus solids content of said material]) x solvent density.



- (4) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined:
- a. the company identification of each coating and cleanup material employed;
 - b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(4)b. x d)(4)c.] for each individual HAP, in lbs;
 - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d)(4)d. for all coatings and cleanup materials), in lbs;
 - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of d)(4)e. for all HAPs for all coatings and cleanup materials), in lbs; and
 - g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
- (5) The permit to install for emissions units K007 and K008 were evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour work week, for each toxic compound emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices";
or



- ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard was then adjusted to account for the duration of the exposure or the operating hours of the emissions units, i.e., "16" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants or "worst case" toxic contaminants:

Toxic Contaminant: 1,6 - hexamethylene diisocyanate
 TLV (mg/m3): 0.0344
 Maximum Hourly Emission Rate (lbs/hr): 0.014 for emissions units K007 and K008 combined
 Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 1.05
 MAGLC (µg/m3): 1.23

The permittee, having demonstrated that emissions of 1,6 - hexamethylene diisocyanate, from emissions units K007 and K008, is estimated to be equal to or greater than eighty percent, but less than 100 percent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (6) Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the changes to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV), 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions units or their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

- (7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute:"
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxics modeled (composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run, that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions units to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.
- (8) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason for the change and if the change would increase the ground-level concentration.



- (9) Any surface coating process not exempt under paragraph (A)(1)(h) to (A)(1)(k) of OAC rule 3745-17-11 shall follow all of these work practices:
- a. The owner or operator shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the owner or operator during the time period in which the control devices are utilized.
 - b. The owner or operator shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator.
 - c. The owner or operator shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the owner or operator shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the owner or operator shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
 - d. The owner or operator shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.
 - e. In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The owner or operator shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.
 - f. Any documentation required under paragraphs (C)(2)(d) and (C)(2)(e) of OAC rule 3745-17-11 shall be maintained for not less than five years.
 - g. Any documentation required under paragraphs (C)(2)(a) to (C)(2)(e) of OAC rule 3745-17-11 shall be maintained at the facility and shall be made available to Ohio EPA upon request.
- (10) The permittee shall collect and record the total hours of operation each day for this emissions unit.



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the rolling, 12-month OC emission limitation of 27.72 tons, for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined).
 - b. All exceedances of the monthly OC emission limitation of 1,293.75 pounds (from the cleanup operations for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined).
 - c. All exceedances of the rolling, 12-month coatings usage restriction of 15,840 gallons (for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined).
 - d. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.15 tons and 22.23 tons, respectively (for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

- (2) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 3.50 lbs of VOC/gallon of coating, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
- (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 these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 27.72 tons of OC per rolling, 12-month period from coating operations [for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined]

Applicable Compliance Method: Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in section d)(2) of this permit.



- b. Emission Limitation: 1,293.75 lbs OC/month and 7.76 tons OC/yr from the cleanup operations (for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined)

Applicable Compliance Method: Compliance with the monthly and annual allowable OC emission limitations above shall be based upon the record keeping requirements specified in section d)(3) of this permit.

- c. Emission Limitation: Annual HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section d)(4) of this permit.

- d. Emission Limitation: 3.50 pounds VOC per gallon of coating, as applied

Applicable Compliance Method: Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section d)(1) of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

- e. Emission Limitation: The maximum annual coatings usage rate for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rates.

Applicable Compliance Method: Compliance with the annual allowable coatings usage restriction above shall be based upon the record keeping requirements specified in section d)(2) of this permit.

g) Miscellaneous Requirements

- (1) None.



9. K008, Paint Booth

Operations, Property and/or Equipment Description:

miscellaneous metal parts coating operation (Paint Booth no. 8)

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. b)(2)d., d)(5), d)(6), d)(7) and d)(8).

(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. d)(5) through d)(8).

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)(b)	See b)(2)a.
b.	OAC rule 3745-31-05(D)	27.72 tons of OC per rolling, 12-month period from coating operations [for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined] [See b)(2)b.i. and c)(1)]. 1,293.75 lbs OC/month and 7.76 tons OC/yr from cleanup operations [for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined] 9.15 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 22.23 tons per rolling, 12-month period for any combination of HAPs [for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined] [See b)(2)b.ii.].
c.	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(C)	See c)(2) and d)(9)
e.	ORC 3704.03(F) and OAC rule 3745-114-01	See b)(2)c.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC and PE emissions from this air contaminant source since the uncontrolled potential to emit for VOC and PE are less than 10 tons per year.
- b. This permit establishes the following federally enforceable emissions limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 27.72 tons OC per rolling, 12-month period based on coating usage restrictions for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined [See c)(1)]. For purposes of federally enforceability a limitation on OC effectively restricts VOC.
 - ii. Annual HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.
- c. In order to demonstrate compliance with the "Toxic Air Contaminant Statute", the Director has established, per ORC 3704.03(F)(4)(c), a limit for 1,6 - hexamethylene diisocyanate, which shall not exceed 0.224 pounds per day. This daily allowable emissions rate was calculated by multiplying the approved daily operating schedule submitted in the permit application (16 hours per day), by the emission rate modeled (0.014 lbs/hour) to determine the ground level concentration

c) Operational Restrictions

- (1) The maximum annual coating usage rate for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.
- (2) Any surface coating process not exempt under paragraphs (A)(1)(h) to (A)(1)(l) of OAC rule 3745-17-11 shall be controlled by a dry particulate filter, water-wash, or equivalent control device or devices.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all the coatings employed in this emissions unit:



- a. the name and identification number of each coating employed; and
 - b. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$].
- (2) The permittee shall collect and record the following information each month for all the coatings employed for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined:
- a. the name and identification number of each coating employed;
 - b. the OC content of each coating, as applied, in pounds per gallon;
 - c. the number of gallons of each coating employed;
 - d. the total number of gallons of all the coatings employed (summation of d)(2)c. for all coatings);
 - e. the rolling, 12-month coatings usage rates, in gallons;
 - f. the OC emissions rate for each coating employed [d)(2)b. x d)(2)c.], in pounds;
 - g. the total OC emissions rate for all the coatings employed (summation of d)(2)f. for all coatings), in pounds or tons;
 - h. the rolling 12-month OC emissions rate, in tons; and
 - i. the rolling 12-month coatings usage rate, in gallons.
- (3) The permittee shall collect and record the following each month for cleanup operations in emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined:
- a. the name and identification number of each cleanup material employed;
 - b. the OC content of each cleanup material employed, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC emissions from each cleanup material employed [d)(3)b. x d)(3)c.];
 - e. the total OC emissions from all the cleanup materials employed (summation of d)(3)d. for each calendar month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off site for disposal or reclamation [minus solids content of said material]) x solvent density.



- (4) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined:
- a. the company identification of each coating and cleanup material employed;
 - b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(4)b. x d)(4)c.] for each individual HAP, in lbs;
 - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d)(4)d. for all coatings and cleanup materials), in lbs;
 - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of C.4.e for all HAPs for all coatings and cleanup materials), in lbs; and
 - g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
- (5) The permit to install for emissions units K007 and K008 were evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour work week, for each toxic compound emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices";
or



- ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard was then adjusted to account for the duration of the exposure or the operating hours of the emissions units, i.e., "16" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants or "worst case" toxic contaminants:

Toxic Contaminant: 1,6 - hexamethylene diisocyanate
 TLV (mg/m3): 0.0344
 Maximum Hourly Emission Rate (lbs/hr): 0.014 for emissions units K007 and K008 combined
 Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 1.05
 MAGLC (µg/m3): 1.23

The permittee, having demonstrated that emissions of 1,6 - hexamethylene diisocyanate, from emissions units K007 and K008, is estimated to be equal to or greater than eighty percent, but less than 100 percent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (6) Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the changes to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV), 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions units or their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

- (7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute:"
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxics modeled (composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run, that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions units to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.
- (8) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason for the change and if the change would increase the ground-level concentration.



- (9) Any surface coating process not exempt under paragraph (A)(1)(h) to (A)(1)(k) of OAC rule 3745-17-11 shall follow all of these work practices:
- a. The owner or operator shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the owner or operator during the time period in which the control devices are utilized.
 - b. The owner or operator shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator.
 - c. The owner or operator shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the owner or operator shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the owner or operator shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
 - d. The owner or operator shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.
 - e. In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The owner or operator shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.
 - f. Any documentation required under paragraphs (C)(2)(d) and (C)(2)(e) of OAC rule 3745-17-11 shall be maintained for not less than five years.
 - g. Any documentation required under paragraphs (C)(2)(a) to (C)(2)(e) of OAC rule 3745-17-11 shall be maintained at the facility and shall be made available to Ohio EPA upon request.
- (10) The permittee shall collect and record the total hours of operation each day for this emissions unit.



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the rolling, 12-month OC emission limitation of 27.72 tons, for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined).
 - b. All exceedances of the monthly OC emission limitation of 1,293.75 pounds (from the cleanup operations for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined).
 - c. All exceedances of the rolling, 12-month coatings usage restriction of 15,840 gallons (for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined).
 - d. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.15 tons and 22.23 tons, respectively (for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

- (2) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 3.50 lbs of VOC/gallon of coating, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
- (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 these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 27.72 tons of OC per rolling, 12-month period from coating operations [for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined]

Applicable Compliance Method: Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in section d)(2) of this permit.



- b. Emission Limitation: 1,293.75 lbs OC/month and 7.76 tons OC/yr from the cleanup operations (for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined)

Applicable Compliance Method: Compliance with the monthly and annual allowable OC emission limitations above shall be based upon the record keeping requirements specified in section d)(3) of this permit.

- c. Emission Limitation: Annual HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section d)(4) of this permit.

- d. Emission Limitation: 3.50 pounds VOC per gallon of coating, as applied

Applicable Compliance Method: Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section d)(1) of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

- e. Emission Limitation: The maximum annual coatings usage rate for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rates.

Applicable Compliance Method: Compliance with the annual allowable coatings usage restriction above shall be based upon the record keeping requirements specified in section d)(2) of this permit.

g) Miscellaneous Requirements

- (1) None.