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

1/20/2009

Certified Mail

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

Tim McCarrick
Trans-Acc Inc. - Dixie Hwy Facility
11167 Deerfield Road
Blue Ash, OH 45242

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1409031041
Permit Number: P0104127
Permit Type: Initial Installation
County: Butler

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Journal News. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page http://www.epa.state.oh.us/dapc in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Hamilton County Dept. of Environmental Services at (513)946-7777.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
HCDOES; Indiana; Kentucky

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   ___ Netting Determination

2. Source Description:
   The Trans-Acc Fairfield plant is a contract coating job shop of miscellaneous metal parts. At present the operations at this facility consist of a single miscellaneous metal parts paint booth (emissions unit K001) (PTI 14-06046). The majority of orders are for military programs using a select number of pre-approved coatings.

   This air permitting action is a first-issue Permit to Install and Operate (PTIO) for a second miscellaneous metal parts paint booth (emissions unit K002). Emissions unit K002 is the same size as emissions unit K001 and will be operated in the same fashion.

3. Facility Emissions and Attainment Status:
   This facility is located in Butler County, which is currently non-attainment for 8-hour ozone standard (VOC and NOX), non-attainment for particulate matter 2.5 microns and less in diameter (PM2.5), and attainment for all other criteria pollutants.

   The facility currently is permitted to emit 9.9 tons of VOC per year in order to avoid a short term restriction. The facility is minor source of particulate emissions, including PM10 and PM2.5.

   Coating VOC content limitations are as follows:
   4.3 lb/gal – clear coatings
   4.0 lb/gal – zinc rich primer coatings
   3.5 lb/gal (daily volume weighted average) – extreme performance coatings
   3.5 lb/gal – coatings dried at <200 degrees F
   3.0 lb/gal (daily volume weighted average) – all other coatings

   This facility, coupled with the Trans-Acc Hamilton Plant (PN 1409040883), is currently being treated as a single facility/stationary source under common ownership potentially subject to Title V and/or major NSR. This is because there are a number of conflicting interpretations of this issue within US EPA guidance memos; therefore, the permittee is seeking to avoid any potential Title V compliance concerns by limiting the emissions from the two facilities, combined. A modification to PTI 14-05946 for the Trans-Acc Hamilton Plant (PN 1409040883) is being processed to reduce emissions from 89.32 TPY to 79.42 TPY. This will allow the Trans-Acc Fairfield Plant to emit a proposed 19.8 TPY tons of VOC per year. These 19.8 tons includes 9.9 tons each from emissions units K001 and K002. HAP emissions from the two facilities combined will be limited to 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPS.

4. Source Emissions:

   Emissions unit K002 has a maximum potential to emit of 61.32 TPY for VOC. In order to keep VOC emissions for the Trans-Acc Hamilton Plant and Trans-Acc Fairfield plant combined below major source thresholds, the VOC emissions for emissions unit K002 are being limited to 9.9 TPY. This will also give the Trans-Acc Fairfield Plant the ability to avoid BAT for emissions unit K002.

5. Conclusion:

The permittee has proposed to comply with the federally enforceable emission limitations of 9.9 TPY VOC and 9.9/24.9 TPY HAPs as a 12-month rolling summation; has proposed associated operational and emissions record keeping and reporting to demonstrate compliance with these limitations; and will accept the terms and conditions of this permit which will limit emissions of VOC and HAPS as a Synthetic Minor so that the paint booth and facility will not trigger Title V (the permittee will also accept Synthetic Minor restrictions on their Hamilton Plant operations, processed under separate permitting actions). The facility will maintain records and be subject to reporting as outlined in the permit to ensure compliance with the voluntary synthetic minor emissions limitations.

6. Please provide additional notes or comments as necessary:

The toxics modeling was the same as the modeling presented by Trans-Acc with the permit for emissions unit K001, due to the fact that the two paint booths will be identical.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
VOC	9.9
Individual HAP	9.9
Combined HAPs	24.9

Butler County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Trans-Acc Inc. - Dixie Hwy Facility

Issue Date: 1/20/2009
Permit Number: P0104127
Permit Type: Initial Installation
Permit Description: New installation for a spray booth
Facility ID: 1409031041
Facility Location: Trans-Acc Inc. - Dixie Hwy Facility
4416 Dixie Highway,
Fairfield, OH 45014
Facility Description: Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Paul Tedtman at Hamilton County Dept. of Environmental Services, 250 William Howard Taft Pkwy. or (513)946-7777. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

Air Pollution Permit-to-Install and Operate
for
Trans-Acc Inc. - Dixie Hwy Facility

Facility ID: 1409031041
Permit Number: P0104127
Permit Type: Initial Installation
Issued: 1/20/2009
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
Trans-Acc Inc. - Dixie Hwy Facility

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 11

1. K002 12

Authorization

Facility ID: 1409031041
Application Number(s): A0036364
Permit Number: P0104127
Permit Description: New installation for a spray booth
Permit Type: Initial Installation
Permit Fee: $200.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 1/20/2009
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Trans-Acc Inc. - Dixie Hwy Facility
4416 Dixie Highway
Fairfield, OH 45014

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:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

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: P0104127
Permit Description: New installation for a spray booth

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**K002**
Company Equipment ID:	K002
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

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

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

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

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

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

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

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

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

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

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

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

   This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.
You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) 2., 3., 4., and 5.

2. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from the Trans-Acc Hamilton Plant (Premise 1409040883) and the Trans-Acc Fairfield Plant (Premise 1409031041) emissions units K004 (Miscellaneous Metal Parts Coating Line – Hamilton Plant), P002 (Abrasive Blasting Enclosure – Hamilton Plant), K001 (Miscellaneous Metal Parts Paint Booth No. 1 – Fairfield Plant), K002 (Miscellaneous Metal Parts Paint Booth No. 2 – Fairfield Plant), other de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 tons per year (TPY)* for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

   *This assumes that the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

   The permittee has existing records of existing sources to demonstrate compliance with this limitation upon issuance of this permit.

3. The permittee shall collect and record the following information each month for the emissions units identified in 2. above:

   a) The name and identification number of each coating, employed;

   b) The individual HAP* content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

   c) The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from b)];

   d) The number of gallons of each coating employed;

   e) The name and identification number of each cleanup/cleaning solvent employed;

   f) The individual HAP content for each HAP of each cleanup/cleaning solvent, in pounds of individual HAP per gallon of cleanup/cleaning solvent, as applied;

   g) The total combined HAP content of each cleanup/cleaning solvent, in pounds of combined HAPs per gallon of cleanup/cleaning solvent, as applied [sum all the individual HAP contents from f)];

h) The number of gallons of each cleanup/cleaning solvent employed;

i) The total individual HAP emissions** for each HAP from all coatings and cleanup/cleaning solvents employed, in pounds or tons per month [for each HAP the sum of b) times d) for each coating plus the sum of f) times h) for each cleanup/cleaning solvent];

j) The total combined HAP emissions** from all coatings and cleanup/cleaning solvents employed, in pounds or tons per month [the sum of c) times d) for each coating plus the sum of g) times h) for each cleanup/cleaning solvent];

k) The updated rolling, 12-month summation of emissions for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

l) The updated rolling, 12-month summation of emissions for total combined HAPs**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting Hamilton County Department of Environmental Services**.** This information does not have to be kept on an individual emissions unit basis.

**This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations specified in 2. above. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

5. Compliance with the emissions limitations in 2. of these terms and conditions shall be determined in accordance with the following method(s) identified below:

a) Emission Limitations:

Actual emissions of Hazardous Air Pollutants (HAPs) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, as a 12-month rolling summation, as specified in 2. above.

Applicable Compliance Method:

Compliance with the 12-month rolling HAP limitations shall be demonstrated by the record keeping identified in 3. above.

C. Emissions Unit Terms and Conditions

1. **K002**

Operations, Property and/or Equipment Description:

Miscellaneous Metal Parts Paint Booth No. 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. d)(7), d)(8), d)(9), and d)(10).

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

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

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(D) Synthetic Minor to Avoid Title V permitting and BAT	See b)(2)a., b)(2)b, c)(1), and Section B.2.
b.	OAC rule 3745-21-09(U)(1)(a)	See b)(2)c.
c.	OAC rule 3745-21-09(U)(1)(b)	See b)(2)d.
d.	OAC rule 3745-21-09(U)(1)(c)	See b)(2)e.
e.	OAC rule 3745-21-09(U)(1)(d)	See b)(2)f.
f.	OAC rule 3745-21-09(U)(1)(i)	See b)(2)g.
g.	OAC rule 3745-17-11(C)	See b)(2)h., c)(2), and c)(3).

(2) Additional Terms and Conditions

a. Permit to Install and Operate (PTIO) P0104127 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

The summation of all Volatile Organic Compounds (VOC) emissions from coating and cleanup operations shall not exceed 9.9 TPY.

b. The VOC emissions from emissions unit K002 (Miscellaneous Metal Parts Paint Booth No. 2), including cleanup and cleaning solvent emissions, shall not exceed 9.9 tons per year (TPY), based upon a rolling, 12-month summation.

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

Month(s)	Maximum Allowable Cumulative Emissions
1	1.0
1-2	2.0
1-3	3.0
1-4	4.0
1-5	5.0
1-6	6.0
1-7	7.0
1-8	8.0
1-9	9.0
1-10	9.9
1-11	9.9
1-12	9.9

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation shall be based upon a rolling, 12 month summation of the emissions.

c. The VOC content for each clear coating employed in this emissions unit shall not exceed 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

d. The VOC content for each coating employed in this emissions unit that is a zinc rich primer coating shall not exceed 4.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

e. The VOC content of extreme performance coatings employed in this emissions unit shall not exceed a daily volume-weighted average 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

f. The VOC content for each coating employed in this emissions unit that is dried at temperatures not exceeding two hundred degrees Fahrenheit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

g. The VOC content of coatings employed in this emissions unit, that are not specified under terms b)(2)b., b)(2)c., b)(2)d. and b)(2)e. shall not exceed a daily volume-weighted average of 3.0 lbs per gallon, as applied, excluding water and exempt solvents.

If a miscellaneous metal parts of products coating is subject to two or more limits as listed in b)(2)c, b)(2)d, b)(2)e, b)(2)f and b)(2)g above, the limit which is least restrictive shall apply.

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

c) Operational Restrictions

(1) The total VOC input from coatings and cleanup/cleaning solvents employed in emissions unit K001 shall not exceed 9.9 TPY. Compliance with the above limitation shall be based upon a rolling 12 month summation of the VOC input. The VOC input shall be determined by multiplying the number of gallons of each coating and cleanup/cleaning solvent employed per month by the VOC content of each coating and cleanup/cleaning solvent, in pounds per gallon. The VOC input of coatings and cleanup/cleaning solvents shall be assumed to be 100 percent of the VOC content of the coatings and cleanup/cleaning solvents employed and, as such, are equivalent to the VOC emission rate.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions
1	1.0
1-2	2.0
1-3	3.0
1-4	4.0
1-5	5.0
1-6	6.0
1-7	7.0
1-8	8.0
1-9	9.0
1-10	9.9
1-11	9.9
1-12	9.9

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual VOC input limitation shall be based upon a rolling, 12 month summation of the VOC input figures.

(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.

(3) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

d) Monitoring and/or Recordkeeping Requirements

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

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

(3) 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.

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

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

a. the name, identification number, and type (extreme performance, dried <200 degrees F, zinc rich primer, other) of each coating, as applied;

b. the VOC content of each coating material, including paint, thinner, catalyst, and other additives, in pounds per gallon, as applied;

c. the number of gallons of each coating material, as applied;

d. the daily VOC emissions from all the coatings employed, in pounds, [i.e., the sum of (b) times (c) for each coating employed];

e. the volume fraction VOC plus solids for each coating material. This is equivalent to [1- volume fraction of water plus exempt solvents] of each coating material; and

f. the daily volume-weighted average VOC content of all coatings used to show compliance with each of the following terms: coating type b)(1)b through b)(1)f, individually, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.

(6) The permittee shall collect and record the following information each month:

a. the company identification of each material employed in this emissions unit;

b. the type of coating, for each material employed in this emissions unit;

c. the VOC content of each coating, excluding water and exempt solvents, employed in this emissions unit;

d. the VOC content of each coating and cleanup material employed in this emissions unit;

e. the quantity, in gallons, of each coating and cleanup material employed in this emissions unit; and

f. a summation of the VOC input/emissions d)(6)d. x d)(6)e. over the previous 12 months.

(7) The permit to install for this emissions unit (K002) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit application. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been

documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

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

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

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

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

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

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

Toxic Contaminant: Toluene

TLV (mg/m3): 75.37

Maximum Hourly Emission Rate (lbs/hr): 4.76

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 133.5

MAGLC (ug/m3): 1794.5

The permittee, has demonstrated that emissions of toluene, from emissions unit(s) K002 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

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

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

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

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

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

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

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

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

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

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

(10) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-

level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. VOC emissions from emissions unit K002 shall not exceed 9.9 TPY, based upon a rolling, 12-month summation;

ii. total VOC input from coatings and cleanup/cleaning solvents employed in emissions unit K002 shall not exceed 9.9 TPY;

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate district office or local air agency).

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

f) Testing Requirements

(1) Compliance with the emission and usage limitation in b) and c) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC input and emissions shall not exceed 9.9 tons per year (TPY), based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in d)(6).

b. Emission Limitation:

The VOC content of coatings employed in this emissions unit, that are not specified under terms b)(2)b, b)(2)c, b)(2)d and b)(2)e shall not exceed a volume weighted average of 3.0 lbs per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

U.S. EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup and cleaning solvents.

Compliance with these VOC content limitations shall be demonstrated by the record keeping requirements specified in d)(5).

c. Emission Limitation:

The VOC content for each clear coating employed in this emissions unit shall not exceed 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

The VOC content for each coating employed in this emissions unit that is a zinc rich primer coating shall not exceed 4.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

The VOC content of extreme performance coatings employed in this emissions unit shall not exceed a volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

The VOC content for each coating employed in this emissions unit that is dried at temperatures not exceeding two hundred degrees Fahrenheit shall not exceed

3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

Applicable Compliance Method:

In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

U.S. EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup and cleaning solvents.

Compliance with these VOC content limitations shall be demonstrated by the record keeping requirements specified in d)(6).

g) Miscellaneous Requirements

(1) None.