



State of Ohio Environmental Protection Agency

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Columbus, Ohio 43215

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

1/27/2009

ED CORTEZ
Alpha Coatings, Inc.
P.O. BOX 1006
Fostoria, OH 44830

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0374010217
Permit Number: P0104078
Permit Type: Initial Installation
County: Seneca

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
Yes	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
Alpha Coatings, Inc.**

Facility ID: 0374010217
Permit Number: P0104078
Permit Type: Initial Installation
Issued: 1/27/2009
Effective: 1/27/2009
Expiration: 1/27/2014



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
Alpha Coatings, Inc.

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Final Permit-to-Install and Operate
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Facility ID: 0374010217
Effective Date: 1/27/2009

Authorization

Facility ID: 0374010217
Application Number(s): A0036345
Permit Number: P0104078
Permit Description: Installation of five miscellaneous metal parts spray booths.
Permit Type: Initial Installation
Permit Fee: \$1,000.00
Issue Date: 1/27/2009
Effective Date: 1/27/2009
Expiration Date: 1/27/2014
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15
This document constitutes issuance to:

Alpha Coatings, Inc.
622 S Corporate Dr
Fostoria, OH 44830

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: P0104078
 Permit Description: Installation of five miscellaneous metal parts spray booths.

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

Group Name: K001-K005

Emissions Unit ID:	K001
Company Equipment ID:	Manual Spray Booth 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Manual Spray Booth 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Manual Spray Booth 3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K004
Company Equipment ID:	Manual Spray Booth 4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K005
Company Equipment ID:	Turn Table
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



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Final Permit-to-Install and Operate

Permit Number: P0104078

Facility ID: 0374010217

Effective Date: 1/27/2009

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



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Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104078

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

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

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

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

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

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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: P0104078

Facility ID: 0374010217

Effective Date: 1/27/2009

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
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Final Permit-to-Install and Operate

Permit Number: P0104078

Facility ID: 0374010217

Effective Date: 1/27/2009

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group - K001-K005: K001, K002, K003, K004, K005,

EU ID	Operations, Property and/or Equipment Description
K001	manual misc. metal parts spray booth #1
K002	manual misc. metal parts spray booth #2
K003	manual misc. metal parts spray booth #3
K004	manual misc. metal parts spray booth #4
K005	misc. metal parts turn table spray booth with pre-heat unit and infrared drying oven

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)(1)h., d)(11), d)(12), d)(13), d)(14) and e)(5).

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

a. b)(1)b., b)(2)c., b)(2)d., d)(4), d)(5), and e)(2).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	63.20 pounds organic compounds (OC)/day and 11.53 tons OC/year from coating operations [See b)(2)g.] 371 pounds OC/month and 2.23 tons OC/year from cleanup operations from emissions units K001, K002, K003, K004, and K005, combined The permittee shall not employ more than ten gallons of coating per day in any individual coating booth (K001, K002, K003, K004, K005, and K006). See b)(2)a.
b.	OAC rule 3745-31-05(D)	Combined limits for emissions units P001, P002, P003, P004, P005, P006,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>P007, R001, R002, R003, R004, R005, R006, R007, R008, K001, K002, K003, K004, and K005:</p> <p>75.0 tons OC per rolling, 365-day period</p> <p>9.9 tons per rolling, 12-month period for any individual HAP*</p> <p>24.9 tons per rolling, 12-month period for any combination of HAPs</p> <p>See b)(2)b. through b)(2)d.</p>
c.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)e.
d.	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 pounds/hour and 40 pounds/day [See b)(2)f. and b)(2)h.]
e.	OAC rule 3745-17-11(C)	See b)(2)i. and b)(2)j., c)(2). and c)(3), and d)(6) through d)(10).
f.	OAC rule 3745-17-11(B)(2)	0.551 pounds particulate emissions (PE)/hour [See b)(2)k.]
g.	ORC 3704.03(F) OAC rule 3745-114-01	See d)(11), d)(12), d)(13), d)(14) and e)(5).

*Hazardous Air Pollutant (HAP), as defined in Section 112(b) of the Clean Air Act

(2) Additional Terms and Conditions

- a. The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-21-07(G)(2), and OAC rule 3745-21-09(U)(2)(e)(iii).
- b. For the purpose of federal enforceability, OC emission limitations will effectively restrict VOC emissions.
- c. This permit establishes a federally enforceable limitation of 75.0 tons OC per rolling, 365-day period for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, R008, K001, K002, K003, K004, and K005, combined, for the purposes of avoiding Title V and PSD applicability.

A federally enforceable limitation of 75.0 tons OC per rolling, 365-day period was initially established in permit to install 03-13939 issued on 6/5/03 and as such the facility has existing records of OC emissions in lieu of establishing monthly OC emissions restrictions for the first year of operation.
- d. The permittee has requested federally enforceable limitations of 9.9 tons of any individual HAP and 24.9 tons of any combination of HAPs per rolling, 12-month



periods for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, R008, K001, K002, K003, K004, and K005, as a group, for the purposes of avoiding Title V and MACT applicability.

Federally enforceable limitations of 9.9 tons of any individual HAP and 24.9 tons of any combination of HAPs per rolling, 12-month was initially established in permit to install 03-13939 issued on 6/5/03 and as such the facility has existing records of HAP emissions in lieu of establishing monthly OC emissions restrictions for the first year of operation.

- e. The requirements of OAC rule 3745-31-05(A)(3) are equivalent or more stringent than the requirements of this rule. Therefore, this emissions unit is exempt from the requirements of OAC rule 3745-21-09(U) pursuant to OAC rule 3745-21-09(U)(2)(e)(iii).
- f. Emissions units K001, K002, K003, K004, and/or K005 shall become subject to OAC rule 3745-21-07(G)(2) for each day when a photochemically reactive material is applied to any non-metal substrate. On any such day, all emissions from both the application of photochemically reactive and non-photochemically reactive materials (coatings) on non-metal substrates are applicable to the requirement that OC emissions shall not exceed 8 pounds/hour and 40 pounds/day.
- g. Emissions units K001, K002, K003, K004, and K005 are each subject to 63.20 pounds OC/day at all times except for when subject to OAC rule 3745-21-07(G)(2), as specified in section b)(2)f.
- h. On February 18, 2008, Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The OAC rule 3745-21-07 does not establish any requirements for this emissions unit. However, the rule rescindment and new rule have not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirement to comply with OAC rule 3745-21-07(G)(2) still exists as part of the federally-approved SIP of Ohio.
- i. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.
- j. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- k. The requirements to comply with this rule shall terminate on the date(s) the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) for particulate emissions and OAC rule 3745-21-07 for organic emissions, as applicable, as revisions to the Ohio SIP.



c) Operational Restrictions

- (1) The permittee shall install, operate, and maintain a 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.
- (2) 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.
- (3) The use of photochemically reactive material (as defined in OAC rule 3745-21-01) for cleanup operations is prohibited.
- (4) Coating usage in each individual emissions unit (K001, K002, K003, K004, and K005) shall not exceed 10 gallons per day. Coating usage includes all coatings employed on all substrates (both metal and non-metal).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for each individual coating operation (K001, K002, K003, K004, K005, and K006):
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the OC content of each coating, in pounds per gallon, as applied;
 - d. the total OC emission rate from all coatings employed, in pounds [summation of d)(1)b. times d)(1)c. for all coatings]; and
 - e. the total volume, in gallons, of all of the coatings employed.
- (2) On any day when any photochemically reactive material is applied to any non-metal substrate, the permittee shall collect and record the following additional information for the affected coating operation(s) for such day:
 - a. the name and identification number for each coating applied to a non-metal substrate;
 - b. the volume, in gallons, of each coating applied to a non-metal substrate;
 - c. the OC content of each coating, in pounds per gallon, as applied to any non-metal substrate;
 - d. the total OC emission rate from all coatings applied to a non-metal substrate, in pounds per day [summation of d(2)b. times d)(1)c. for all coatings];
 - e. the total number of hours the emissions unit(s) was/were involved in the coating of non-metal substrates; and



- f. the average, hourly OC emission rate from coating non-metal substrates, in pounds per hour (average) [d)(2)d./d)(2)e.]
- (3) The permittee shall collect and record the following information each month for cleanup materials used for emissions units K001, K002, K003, K004, K005, and K006, combined:
- a. the name and identification number of each cleanup material employed;
 - b. a demonstration that the cleanup material employed is not a photochemically reactive material as defined in OAC rule 3745-21-01;
 - c. the volume, in gallons, of each cleanup material employed;
 - d. the OC content, in pounds per gallon, of each cleanup material employed;
 - e. the total OC emission rate, in pounds, from all cleanup material employed [summation of d)(3)c. times d)(3)d. for all cleanup material];
- (4) In order to demonstrate compliance with the 365-day, rolling OC emission limitation, the permittee shall collect and record the following information each day for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, R008, K001, K002, K003, K004, and K005, combined:
- a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material, in pounds per gallon,
 - d. the OC emission rate [summation of d)(4)b. times d)(4)c. for all coatings and cleanup materials employed]; and
 - e. the 365-day summation, in tons, of the daily OC emission rates.

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

- (5) In order to demonstrate compliance with the 12-month, rolling HAP emission limitations, the permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, R008, K001, K002, K003, K004, and K005, combined:
- a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon;
 - d. the emission rate, in pounds, for each individual HAP from each coating and cleanup material employed [d)(5)b. times d)(5)c.];



- e. the total emission rate for each HAP from all coatings and cleanup materials employed [summation of d)(5)d. for each individual HAP], in pounds per month;
- f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed [summation of d)(5)e.], in pounds per month;
- g. the rolling, 12-month summation, in tons, of each individual HAP; and
- h. the rolling, 12-month summation, in tons, of the combination of all HAPs.

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

- (6) 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.
- (7) 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.
- (8) 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.
- (9) 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.

- (10) 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.

(11) The federally enforceable permit-to-install and operate (FEPTIO) application for this/these emissions unit(s), P0104078, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The AToxic 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 SCREEN3, 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 AReview 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) AThreshold 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) AThreshold 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., AX[®] hours per day and AY[®] 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 Aworst case[®] toxic contaminant(s):

Toxic Contaminant: Xylene
 TLV (mg/m3): 434.19



Maximum Hourly Emission Rate (lbs/hr): 39.0
Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 2,451.0
MAGLC ($\mu\text{g}/\text{m}^3$): 10,333

Toxic Contaminant: Ethyl Benzene
TLV (mg/m^3): 434.19
Maximum Hourly Emission Rate (lbs/hr): 9.2
Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 578.0
MAGLC ($\mu\text{g}/\text{m}^3$): 10,333

Toxic Contaminant: Toluene
TLV (mg/m^3): 75.36
Maximum Hourly Emission Rate (lbs/hr): 14.5
Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 911.0
MAGLC ($\mu\text{g}/\text{m}^3$): 1,795

The permittee, has demonstrated that emissions of xylene, ethyl benzene, and toluene from emissions unit(s) K001, K002, K003, K004, and K005 were 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 AToxic Air Contaminant Statute, ORC 3704.03(F).

- (12) 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 AToxic 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 AToxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI, PTIO, or FEPTIO (as applicable) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to



determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(13) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute^o, 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 AToxic Air Contaminant Statute^o, 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 AToxic Air Contaminant Statute^o, 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 AToxic Air Contaminant Statute^o, 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.

(14) 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 AToxic Air Contaminant Statute^o, 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) 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.

(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. 75.0 tons OC per rolling, 365-day period for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, R008, K001, K002, K003, K004, and K005, combined;



- ii. 9.9 tons individual HAP per rolling, 12-month period for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, R008, K001, K002, K003, K004, and K005, combined;
 - iii. 24.9 tons combined HAPs per rolling, 12-month period for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, R008, K001, K002, K003, K004, and K005, combined; and
- 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) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter was not in service (normal operation) when the emissions unit was in operation. If there were no deviations from the requirements of this permit during the calendar quarter, the report shall so state that no deviations occurred during the reporting period. The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (5) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the AToxic Air Contaminant Statute^e, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.



f) Testing Requirements

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

a. Emission Limitation:

63.20 pounds OC/day from coating operations

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1)d.

b. Emission Limitation:

11.53 tons OC/year from coating operations

Applicable Compliance Method:

The annual emission limitation was established by multiplying the daily OC emission limitation by a maximum operating schedule of 365 days per year and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the daily emission limitation, compliance with the annual emission limitation will be assumed.

c. Emission Limitations:

8 pounds OC/hour and 40 pounds OC/day

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

d. Emission Limitation:

371 pounds OC/month from cleanup operations from emissions units K001, K002, K003, K004, and K005, combined

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(3).

e. Emission Limitation:

2.23 tons OC/year from cleanup operations from emissions units K001, K002, K003, K004, and K005, combined

Applicable Compliance Method:

The annual emission limitation was established by multiplying the monthly OC emission limitation by a maximum operating schedule of 12 months per year and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with



the monthly emission limitation, compliance with the annual emission limitation will be assumed.

f. Emission Limitation:

Combined limit for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, R008, K001, K002, K003, K004, and K005:

75.0 tons OC per rolling, 365-day period

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in d)(4).

g. Emission Limitations:

Combined limits for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, R008, K001, K002, K003, K004, and K005:

9.9 tons individual HAP per rolling, 12-month period

24.9 tons combined HAPs per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with these emissions limitations in accordance with the recordkeeping requirements specified in d)(5).

h. Emissions Limitation:

Coating usage in each individual emissions unit (K001, K002, K003, K004, and K005) shall not exceed 10 gallons per day

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1)e.

i. Emission Limitation:

0.551 lb PE/hour for each emissions unit (K001, K002, K003, K004, and K005)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1 - TE)(1 - CE)$$

where

$$E = \text{PE rate (lbs/hr)}$$



TE = transfer efficiency (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used)

CE = control efficiency of the control equipment

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5.

- (2) Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

g) Miscellaneous Requirements

- (1) None.