State of Ohio Environmental Protection Agency

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

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

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

Certified Mail

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

2/10/2009

Roberta Soroka
Finishing Technology Inc
4510 Muhlhauser Rd
Hamilton, OH 45011

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1409001045
Permit Number: P0104063
Permit Type: Initial Installation
County: Butler

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 Hamilton County Dept. of Environmental Services. 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: HCDOES

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

Air Pollution Permit-to-Install and Operate
for
Finishing Technology Inc

Facility ID: 1409001045
Permit Number: P0104063
Permit Type: Initial Installation
Issued: 2/10/2009
Effective: 2/10/2009
Expiration: 2/10/2019

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
Finishing Technology Inc

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. K001, Paint Booth No. 1 12
2. K002, Paint Booth No. 2 24
3. K003, Paint Booth No. 3 36

Authorization

Facility ID: 1409001045
Application Number(s): A0035932
Permit Number: P0104063
Permit Description: Instillation of three paint booths.
Permit Type: Initial Installation
Permit Fee: $600.00
Issue Date: 2/10/2009
Effective Date: 2/10/2009
Expiration Date: 2/10/2019
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Finishing Technology Inc
4510 Muhlhauser Rd
Hamilton, OH 45011

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: P0104063
Permit Description: Instillation of three paint booths.

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

Emissions Unit ID:	**K001**
Company Equipment ID:	Paint Booth No. 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Paint Booth No. 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K003**
Company Equipment ID:	Paint Booth No. 3
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) See 2 through 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 emissions units K001 (Paint Spray Booth Number 1), K002 (Paint Spray Booth Number 2), and K003 (Paint Spray Booth Number 3), and any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, and all such emissions units located at Finishing Technology Incorporated, 4510 Muhlhauser Road, Hamilton, Ohio (PN: 1409001045), combined, shall not exceed 9.9 tons per year (TPY) for any single HAP, as a rolling, 12-month summation and 24.9 TPY for any combination of HAPs, as a rolling, 12-month summation.

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 material employed.

   f) The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.

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

   h) The number of gallons of each cleanup material employed.

   i) The total individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons [for each HAP, the sum of b) times d) for all coatings plus the sum of f) times h) for all cleanup materials, and divided by 2,000 pounds per ton, if the units are in tons].

j) The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons [the sum of c) times d) for all coatings plus the sum of g) times h) for all cleanup materials, and divided by 2,000 pounds per tons, if the units are in tons].

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

l) The updated rolling, 12-month summation of emissions for the total combined HAPs, in 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 your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in 2. 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. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling 12-month summation for the emissions units listed in 2.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be demonstrated by the record keeping requirements specified in 3.

C. Emissions Unit Terms and Conditions

1. **K001, Paint Booth No. 1**

Operations, Property and/or Equipment Description:

Paint Booth No. 1

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

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

a. d)(7) through 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)c, c)(1), c)(2), d)(6) and e)(4).

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.	40 CFR Part 63, Subpart HHHHHH (40 CFR 63.11169-11180)	See b)(2)e. - h.
b.	40 CFR 63.1-16 (40 CFR 63.11174)	Table 1 to Subpart HHHHHH of 40 CFR Part 63 – Applicability of General Provisions to Subpart HHHHHH shows which parts of the General Provisions in 40 CFR 63.1-16 apply.
c.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V and Nonattainment New Source Review	See b)(2)a, c)(1) and c)(2) and Section B.2-5.
d.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from coatings shall not exceed 35.4 pounds per hour from emissions units K001. Compliance with OAC rule 3745-31-05(A)(3) also includes compliance with 40 CFR 63, Subpart HHHHHH, OAC rule 3745-31-05(D), OAC rule 3745-17-11(C), OAC rule 3745-21-09(U)(1)(d) and OAC rule 3745-21-09(B)(1).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-11(C)	See b)(2)d.
f.	OAC rule 3745-21-09(U)(1)(d)	See b)(2)b.
g.	OAC rule 3745-21-09(B)(1)	See b)(2)c.

(2) Additional Terms and Conditions

a. The combined annual volatile organic compound (VOC) emissions from emissions units K001 (Paint Spray Booth), K002 (Paint Spray Booth) and K003 (Paint Spray Booth) from the application of coatings and cleanup materials shall not exceed 26.65 tons per year (TPY) based upon a rolling, 12-month summation.

b. Coatings applied in this miscellaneous metal parts coating operation shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

c. Compliance with the 3.5 pounds of VOC per gallon of coating limit is based upon a weighted average by volume of all coating materials employed in the coating line in any one day. The averaging of VOC emissions over two or more coating lines in order to demonstrate compliance with an applicable emission limitation (i.e. cross-line averaging) is prohibited.

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

e. All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment per 40 CFR 63.11173 (f). [40 CFR 63.11173(e)(1)]

f. All spray-applied coatings must be applied in a spray booth fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray that meets the requirements of 40 CFR 63.11173 (e)(2)(i), and (e)(2)(ii), (e)(2)(iii), or (e)(2)(iv). [40 CFR 63.11173 (e)(2)]

g. All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. [40 CFR 63.11173 (e)(3)]

h. All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and

paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used. [40 CFR 63.11173 (e)(4)]

c) Operational Restrictions

(1) The maximum coating usage for emissions units K001, K002 and K003 combined shall not exceed 15,000 gallons per year based upon a rolling, 12-month summation.

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

Months	Maximum allowable cumulative coatings, in gallons
1	1250
1-2	2500
1-3	3750
1-4	5000
1-5	6250
1-6	7500
1-7	8750
1-8	10000
1-9	11250
1-10	12500
1-11	13750
1-12	15000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual usage limitation shall be based on a rolling, 12-month summation of the coating and cleanup material usage figures.

(2) The maximum solvent usage for cleanup for emissions units K001, K002 and K003 combined shall not exceed 120 gallons per year, based upon a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following records:

a. Certification that each painter has completed the training specified in b)(2)e. [40 CFR. 63.11173(f)] with the date the initial training and the most recent refresher training was completed.

b. Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in 40 CFR 63.11173(e)(2)(i).

c. Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according o the procedure in 40 CFR 63.11173(e)(3).

d. Copies of any notification submitted as required by 40 CFR 63.11175 and copies of any report submitted as required by 40 CFR 63.11176.

e. 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.

f. Records of any deviation from the requirements in b)(2)e.- h. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.

(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

The permittee shall document each inspection of the dry filtration system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection. 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.

(3) 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.

(4) The permittee shall maintain daily records of the following for this emissions unit:

a. The company identification of each coating employed;

b. The number of gallons of each coating employed;

c. The volatile organic compound (VOC) content of each coating employed, in pounds per gallon, as applied;

d. The VOC emissions from each coating employed, i.e., d)(4)b. x d)(4)c., in pounds; and

e. The total VOC emissions from this emissions unit, i.e., the sum of d)(4)d. for all coatings employed, in pounds.

(5) The permittee, having chosen to demonstrate compliance by means of a daily volume-weighted average VOC content, shall collect and record the following information each day for the coating line:

a. the name and identification number of each coating, as applied;

b. the mass of VOC per volume of coating (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and

c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$, as follows:

$$(C_{VOC,2})_A = \sum_{i=1}^{n} C_{VOC,2i} L_{Ci} (V_{Si} + V_{VOCi}) / \sum_{i=1}^{n} L_{Ci} (V_{Si} + V_{VOCi})$$

where:

$(C_{VOC,2})_A$ = daily volume-weighted average VOC content of all coatings, as applied.

$C_{VOC,2}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

$$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

where:

D_C = density of coating, in pounds of coating per gallon of coating.

$W_{VOC} = W_{VM} - W_W - W_{ES}$

V_S = the volume fraction of solids in coating, in gallons of solids per gallon of coating.

$V_{VOC} = V_{VM} - V_W - V_{ES}$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period At@.

L_C = liquid volume of coating employed during time period At@, in gallons of coating.

M_C = mass of coating employed during the time period At@, in pounds of coating.

i = subscript denoting a specific coating employed during time period At@.

n = total number of coatings employed during time period At@.

t = time period specified for the weighted average VOC content.

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

a. the name and identification number of each coating and cleanup/cleaning solvent employed;

b. the VOC content for each coating, in pounds of VOC per gallon of coating, as applied;

c. the VOC content for each cleanup/cleaning solvent, in pounds of VOC per gallon of cleaning solvent;

d. the number of gallons of each coating employed;

e. the number of gallons of each cleanup/cleaning solvent employed;

f. the total VOC emissions in pounds or tons [summation of (b. x d.) for all coatings plus (c. x e.) for all cleanup/cleaning solvents and divided by 2,000 pounds per ton if the units are in tons];

g. the updated rolling, 12-month summation of the total VOC emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months;

h. the total coating and total solvent usage for each month; and

i. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, monthly summations of the coating usage and solvent usage figures.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative coating and solvent usages for each calendar month.

(7) 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.

(8) The PTIO application for these emissions units, K001, K002 and K003, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. 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 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 "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 units, (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., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting

calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 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 (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 22.54

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,715

MAGLC (ug/m3): 4,476

The permittee, having demonstrated that emissions of toluene, from emissions units K001, K002 and K003, are estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit(s) at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(9) Prior to making any physical changes to or changes in the method of operation of the emissions units, 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", ORC 3704.03(F), will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the

definition of a "modification", the permittee shall apply for and obtain a final PTI, PTIO, or PTIO (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.

(10) 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.

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 submit an Initial Notification no later than 180 days after initial startup or July 7, 2008, whichever is later. For an existing affected source, you must submit the initial notification no later than January 11, 2010. The initial notification must provide the information specified below.

a. The company name, if applicable.

b. The name, title, street address, telephone number, e-mail address (if available), and signature of the owner and operator, or other certifying company official;

c. The street address (physical location) of the affected source and the street address where compliance records are maintained,

d. An identification of the relevant standard (i.e., this subpart,40 CFR part 63, subpart HHHHHH);

e. A statement of whether the source is already in compliance with each of the relevant requirements of this subpart, or whether the source will be brought into compliance by the compliance date. you must certify in the initial notification whether the source is in compliance with each of the requirements of this subpart. If your source is an existing source, you may certify in the initial notification that the source is already in compliance. If you are certifying in the initial notification that the source is in compliance with the relevant requirements of this subpart, then include also a statement by a responsible official with that official's name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status.

(2) The permittee shall notify the Hamilton County Department of Environmental Services of the date and length of time the dry filtration system was not in service during coating application. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

(3) The permittee shall notify the Hamilton County Department of Environmental Services in writing of each daily record showing a daily volume-weighted average coating VOC content greater than the limitation specified in b)(2)b. 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.

(4) The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emission and material usage limitations outlined in b)(2)a, c)(1) and c)(2). 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) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Coatings applied in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, 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, Lucus, 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, pursuant to Method 24, 40 CFR Part 60, Appendix A, 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.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

b. Emission Limitation:

Volatile Organic Compounds (VOC) shall not exceed 35.4 lb/hour.

Applicable Compliance Method:

Compliance with the above VOC emission limitation shall be determined by multiplying the VOC content of the coating, as applied, by the maximum hourly coating usage rate, as applied, of 6 gallons per hour.

c. Emission Limitation:

Volatile Organic Compounds (VOC) from K001, K002 and K003 combined shall not exceed 26.65 TPY as a rolling 12-month summation.

Applicable Compliance Method:

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

d. Emission Limitation:

The maximum coating usage for emissions units K001, K002 and K003 combined shall not exceed 15,000 gallons per year) based upon a rolling, 12-month summation.

Applicable Compliance Method:

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

e. Emission Limitation:

The maximum solvent usage for cleanup for emissions units K001, K002 and K003 combined shall not exceed 120 gallons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

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

f. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method

When requested by the Ohio EPA, compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

g) Miscellaneous Requirements

None

2. **K002, Paint Booth No. 2**

Operations, Property and/or Equipment Description:

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) through 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)c, c)(1), c)(2), d)(6) and e)(4).

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.	40 CFR Part 63, Subpart HHHHHH (40 CFR 63.11169-11180)	See b)(2)e. - h.
b.	40 CFR 63.1-16 (40 CFR 63.11174)	Table 1 to Subpart HHHHHH of 40 CFR Part 63 – Applicability of General Provisions to Subpart HHHHHH shows which parts of the General Provisions in 40 CFR 63.1-16 apply.
c.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V and Nonattainment New Source Review	See b)(2)a, c)(1) and c)(2) and Section B.2-5.
d.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from coatings shall not exceed 35.4 pounds per hour from emissions units K001. Compliance with OAC rule 3745-31-05(A)(3) also includes compliance with 40 CFR 63, Subpart HHHHHH, OAC rule 3745-31-05(D), OAC rule 3745-17-11(C), OAC rule 3745-21-09(U)(1)(d) and OAC

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rule 3745-21-09(B)(1).
e.	OAC rule 3745-17-11(C)	See b)(2)d.
f.	OAC rule 3745-21-09(U)(1)(d)	See b)(2)b.
g.	OAC rule 3745-21-09(B)(1)	See b)(2)c.

(2) Additional Terms and Conditions

a. The combined annual volatile organic compound (VOC) emissions from emissions units K001 (Paint Spray Booth), K002 (Paint Spray Booth) and K003 (Paint Spray Booth) from the application of coatings and cleanup materials shall not exceed 26.65 tons per year (TPY) based upon a rolling, 12-month summation.

b. Coatings applied in this miscellaneous metal parts coating operation shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

c. Compliance with the 3.5 pounds of VOC per gallon of coating limit is based upon a weighted average by volume of all coating materials employed in the coating line in any one day. The averaging of VOC emissions over two or more coating lines in order to demonstrate compliance with an applicable emission limitation (i.e. cross-line averaging) is prohibited.

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

e. All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment per 40 CFR 63.11173 (f). [40 CFR 63.11173(e)(1)]

f. All spray-applied coatings must be applied in a spray booth fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray that meets the requirements of 40 CFR 63.11173 (e)(2)(i), and (e)(2)(ii), (e)(2)(iii), or (e)(2)(iv). [40 CFR 63.11173 (e)(2)]

g. All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. [40 CFR 63.11173 (e)(3)]

h. All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of

solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used. [40 CFR 63.11173 (e)(4)]

c) Operational Restrictions

(1) The maximum coating usage for emissions units K001, K002 and K003 combined shall not exceed 15,000 gallons per year based upon a rolling, 12-month summation.

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

Months	Maximum allowable cumulative coatings, in gallons
1	1250
1-2	2500
1-3	3750
1-4	5000
1-5	6250
1-6	7500
1-7	8750
1-8	10000
1-9	11250
1-10	12500
1-11	13750
1-12	15000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual usage limitation shall be based on a rolling, 12-month summation of the coating and cleanup material usage figures.

(2) The maximum solvent usage for cleanup for emissions units K001, K002 and K003 combined shall not exceed 120 gallons per year, based upon a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following records:

a. Certification that each painter has completed the training specified in b)(2)e. [40 CFR. 63.11173(f)] with the date the initial training and the most recent refresher training was completed.

b. Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in 40 CFR 63.11173(e)(2)(i).

c. Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve

a transfer efficiency equivalent to that of an HVLP spray gun, according o the procedure in 40 CFR 63.11173(e)(3).

d. Copies of any notification submitted as required by 40 CFR 63.11175 and copies of any report submitted as required by 40 CFR 63.11176.

e. 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.

f. Records of any deviation from the requirements in b)(2)e.- h. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.

(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

The permittee shall document each inspection of the dry filtration system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection. 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.

(3) 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.

(4) The permittee shall maintain daily records of the following for this emissions unit:

a. The company identification of each coating employed;

b. The number of gallons of each coating employed;

c. The volatile organic compound (VOC) content of each coating employed, in pounds per gallon, as applied;

d. The VOC emissions from each coating employed, i.e., d)(4)b. x d)(4)c., in pounds; and

e. The total VOC emissions from this emissions unit, i.e., the sum of d)(4)d. for all coatings employed, in pounds.

(5) The permittee, having chosen to demonstrate compliance by means of a daily volume-weighted average VOC content, shall collect and record the following information each day for the coating line:

a. the name and identification number of each coating, as applied;

b. the mass of VOC per volume of coating (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and

c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$, as follows:

$$(C_{VOC,2})_A = \sum_{i=1}^{n} C_{VOC,2i} L_{Ci} (V_{Si} + V_{VOCi}) / \sum_{i=1}^{n} L_{Ci} (V_{Si} + V_{VOCi})$$

where:

$(C_{VOC,2})_A$ = daily volume-weighted average VOC content of all coatings, as applied.

$C_{VOC,2}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

$$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

where:

D_C = density of coating, in pounds of coating per gallon of coating.

$W_{VOC} = W_{VM} - W_W - W_{ES}$

V_S = the volume fraction of solids in coating, in gallons of solids per gallon of coating.

$V_{VOC} = V_{VM} - V_W - V_{ES}$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period At@.

L_C = liquid volume of coating employed during time period At@, in gallons of coating.

M_C = mass of coating employed during the time period At@, in pounds of coating.

i = subscript denoting a specific coating employed during time period At@.

n = total number of coatings employed during time period At@.

t = time period specified for the weighted average VOC content.

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

a. the name and identification number of each coating and cleanup/cleaning solvent employed;

b. the VOC content for each coating, in pounds of VOC per gallon of coating, as applied;

c. the VOC content for each cleanup/cleaning solvent, in pounds of VOC per gallon of cleaning solvent;

d. the number of gallons of each coating employed;

e. the number of gallons of each cleanup/cleaning solvent employed;

f. the total VOC emissions in pounds or tons [summation of (b. x d.) for all coatings plus (c. x e.) for all cleanup/cleaning solvents and divided by 2,000 pounds per ton if the units are in tons];

g. the updated rolling, 12-month summation of the total VOC emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months;

h. the total coating and total solvent usage for each month; and

i. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, monthly summations of the coating usage and solvent usage figures.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative coating and solvent usages for each calendar month.

(7) 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.

(8) The PTIO application for these emissions units, K001, K002 and K003, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. 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 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 "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 units, (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., "24" hours per day and "7" days

per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 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 (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 22.54

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,715

MAGLC (ug/m3): 4,476

The permittee, having demonstrated that emissions of toluene, from emissions units K001, K002 and K003, are estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit(s) at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(9) Prior to making any physical changes to or changes in the method of operation of the emissions units, 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", ORC 3704.03(F), will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant

Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI, PTIO, or PTIO (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.

(10) 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.

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 submit an Initial Notification no later than 180 days after initial startup or July 7, 2008, whichever is later. For an existing affected source, you must submit the initial notification no later than January 11, 2010. The initial notification must provide the information specified below.

a. The company name, if applicable.

b. The name, title, street address, telephone number, e-mail address (if available), and signature of the owner and operator, or other certifying company official;

c. The street address (physical location) of the affected source and the street address where compliance records are maintained,

d. An identification of the relevant standard (i.e., this subpart,40 CFR part 63, subpart HHHHHH);

e. A statement of whether the source is already in compliance with each of the relevant requirements of this subpart, or whether the source will be brought into compliance by the compliance date. you must certify in the initial notification whether the source is in compliance with each of the requirements of this subpart. If your source is an existing source, you may certify in the initial notification that the source is already in compliance. If you are certifying in the initial notification that the source is in compliance with the relevant requirements of this subpart, then include also a statement by a responsible official with that official's name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status.

(2) The permittee shall notify the Hamilton County Department of Environmental Services of the date and length of time the dry filtration system was not in service during coating application. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

(3) The permittee shall notify the Hamilton County Department of Environmental Services in writing of each daily record showing a daily volume-weighted average coating VOC content greater than the limitation specified in b)(2)b. 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.

(4) The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emission and material usage limitations outlined in b)(2)a, c)(1) and c)(2). 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) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Coatings applied in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, 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, Lucus, 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, pursuant to Method 24, 40 CFR Part 60, Appendix A, 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.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

b. Emission Limitation:

Volatile Organic Compounds (VOC) shall not exceed 35.4 lb/hour.

Applicable Compliance Method:

Compliance with the above VOC emission limitation shall be determined by multiplying the VOC content of the coating, as applied, by the maximum hourly coating usage rate, as applied, of 6 gallons per hour.

c. Emission Limitation:

Volatile Organic Compounds (VOC) from K001, K002 and K003 combined shall not exceed 26.65 TPY as a rolling 12-month summation.

Applicable Compliance Method:

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

d. Emission Limitation:

The maximum coating usage for emissions units K001, K002 and K003 combined shall not exceed 15,000 gallons per year) based upon a rolling, 12-month summation.

Applicable Compliance Method:

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

e. Emission Limitation:

The maximum solvent usage for cleanup for emissions units K001, K002 and K003 combined shall not exceed 120 gallons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

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

f. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method

When requested by the Ohio EPA, compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

g) Miscellaneous Requirements

None

3. **K003, Paint Booth No. 3**

Operations, Property and/or Equipment Description:

Paint Booth No. 3

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

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

a. d)(7) through 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)c, c)(1), c)(2), d)(6) and e)(4).

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.	40 CFR Part 63, Subpart HHHHHH (40 CFR 63.11169-11180)	See b)(2)e. - h.
b.	40 CFR 63.1-16 (40 CFR 63.11174)	Table 1 to Subpart HHHHHH of 40 CFR Part 63 – Applicability of General Provisions to Subpart HHHHHH shows which parts of the General Provisions in 40 CFR 63.1-16 apply.
c.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V and Nonattainment New Source Review	See b)(2)a, c)(1) and c)(2) and Section B.2-5.
d.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from coatings shall not exceed 35.4 pounds per hour from emissions units K001. Compliance with OAC rule 3745-31-05(A)(3) also includes compliance with 40 CFR 63, Subpart HHHHHH, OAC rule 3745-31-05(D), OAC rule 3745-17-11(C), OAC rule 3745-21-09(U)(1)(d) and OAC rule 3745-21-09(B)(1).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-11(C)	See b)(2)d.
f.	OAC rule 3745-21-09(U)(1)(d)	See b)(2)b.
g.	OAC rule 3745-21-09(B)(1)	See b)(2)c.

(2) Additional Terms and Conditions

a. The combined annual volatile organic compound (VOC) emissions from emissions units K001 (Paint Spray Booth), K002 (Paint Spray Booth) and K003 (Paint Spray Booth) from the application of coatings and cleanup materials shall not exceed 26.65 tons per year (TPY) based upon a rolling, 12-month summation.

b. Coatings applied in this miscellaneous metal parts coating operation shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

c. Compliance with the 3.5 pounds of VOC per gallon of coating limit is based upon a weighted average by volume of all coating materials employed in the coating line in any one day. The averaging of VOC emissions over two or more coating lines in order to demonstrate compliance with an applicable emission limitation (i.e. cross-line averaging) is prohibited.

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

e. All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment per 40 CFR 63.11173 (f). [40 CFR 63.11173(e)(1)]

f. All spray-applied coatings must be applied in a spray booth fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray that meets the requirements of 40 CFR 63.11173 (e)(2)(i), and (e)(2)(ii), (e)(2)(iii), or (e)(2)(iv). [40 CFR 63.11173 (e)(2)]

g. All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. [40 CFR 63.11173 (e)(3)]

h. All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and

paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used. [40 CFR 63.11173 (e)(4)]

c) Operational Restrictions

(1) The maximum coating usage for emissions units K001, K002 and K003 combined shall not exceed 15,000 gallons per year based upon a rolling, 12-month summation.

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

Months	Maximum allowable cumulative coatings, in gallons
1	1250
1-2	2500
1-3	3750
1-4	5000
1-5	6250
1-6	7500
1-7	8750
1-8	10000
1-9	11250
1-10	12500
1-11	13750
1-12	15000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual usage limitation shall be based on a rolling, 12-month summation of the coating and cleanup material usage figures.

(2) The maximum solvent usage for cleanup for emissions units K001, K002 and K003 combined shall not exceed 120 gallons per year, based upon a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following records:

a. Certification that each painter has completed the training specified in b)(2)e. [40 CFR. 63.11173(f)] with the date the initial training and the most recent refresher training was completed.

b. Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in 40 CFR 63.11173(e)(2)(i).

c. Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according o the procedure in 40 CFR 63.11173(e)(3).

d. Copies of any notification submitted as required by 40 CFR 63.11175 and copies of any report submitted as required by 40 CFR 63.11176.

e. 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.

f. Records of any deviation from the requirements in b)(2)e.- h. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.

(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

The permittee shall document each inspection of the dry filtration system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection. 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.

(3) 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.

(4) The permittee shall maintain daily records of the following for this emissions unit:

a. The company identification of each coating employed;

b. The number of gallons of each coating employed;

c. The volatile organic compound (VOC) content of each coating employed, in pounds per gallon, as applied;

d. The VOC emissions from each coating employed, i.e., d)(4)b. x d)(4)c., in pounds; and

e. The total VOC emissions from this emissions unit, i.e., the sum of d)(4)d. for all coatings employed, in pounds.

(5) The permittee, having chosen to demonstrate compliance by means of a daily volume-weighted average VOC content, shall collect and record the following information each day for the coating line:

a. the name and identification number of each coating, as applied;

b. the mass of VOC per volume of coating (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and

c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$, as follows:

$$(C_{VOC,2})_A = \sum_{i=1}^{n} C_{VOC,2i} L_{Ci} (V_{Si} + V_{VOCi}) / \sum_{i=1}^{n} L_{Ci} (V_{Si} + V_{VOCi})$$

where:

$(C_{VOC,2})_A$ = daily volume-weighted average VOC content of all coatings, as applied.

$C_{VOC,2}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

$$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

where:

D_C = density of coating, in pounds of coating per gallon of coating.

$W_{VOC} = W_{VM} - W_W - W_{ES}$

V_S = the volume fraction of solids in coating, in gallons of solids per gallon of coating.

$V_{VOC} = V_{VM} - V_W - V_{ES}$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period At@.

L_C = liquid volume of coating employed during time period At@, in gallons of coating.

M_C = mass of coating employed during the time period At@, in pounds of coating.

i = subscript denoting a specific coating employed during time period At@.

n = total number of coatings employed during time period At@.

t = time period specified for the weighted average VOC content.

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

a. the name and identification number of each coating and cleanup/cleaning solvent employed;

b. the VOC content for each coating, in pounds of VOC per gallon of coating, as applied;

c. the VOC content for each cleanup/cleaning solvent, in pounds of VOC per gallon of cleaning solvent;

d. the number of gallons of each coating employed;

e. the number of gallons of each cleanup/cleaning solvent employed;

f. the total VOC emissions in pounds or tons [summation of (b. x d.) for all coatings plus (c. x e.) for all cleanup/cleaning solvents and divided by 2,000 pounds per ton if the units are in tons];

g. the updated rolling, 12-month summation of the total VOC emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months;

h. the total coating and total solvent usage for each month; and

i. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, monthly summations of the coating usage and solvent usage figures.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative coating and solvent usages for each calendar month.

(7) 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.

(8) The PTIO application for these emissions units, K001, K002 and K003, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. 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 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 "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 units, (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., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting

calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 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 (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 22.54

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,715

MAGLC (ug/m3): 4,476

The permittee, having demonstrated that emissions of toluene, from emissions units K001, K002 and K003, are estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit(s) at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(9) Prior to making any physical changes to or changes in the method of operation of the emissions units, 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", ORC 3704.03(F), will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the

definition of a "modification", the permittee shall apply for and obtain a final PTI, PTIO, or PTIO (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.

(10) 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.

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 submit an Initial Notification no later than 180 days after initial startup or July 7, 2008, whichever is later. For an existing affected source, you must submit the initial notification no later than January 11, 2010. The initial notification must provide the information specified below.

a. The company name, if applicable.

b. The name, title, street address, telephone number, e-mail address (if available), and signature of the owner and operator, or other certifying company official;

c. The street address (physical location) of the affected source and the street address where compliance records are maintained,

d. An identification of the relevant standard (i.e., this subpart,40 CFR part 63, subpart HHHHHH);

e. A statement of whether the source is already in compliance with each of the relevant requirements of this subpart, or whether the source will be brought into compliance by the compliance date. you must certify in the initial notification whether the source is in compliance with each of the requirements of this subpart. If your source is an existing source, you may certify in the initial notification that the source is already in compliance. If you are certifying in the initial notification that the source is in compliance with the relevant requirements of this subpart, then include also a statement by a responsible official with that official's name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status.

(2) The permittee shall notify the Hamilton County Department of Environmental Services of the date and length of time the dry filtration system was not in service during coating application. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

(3) The permittee shall notify the Hamilton County Department of Environmental Services in writing of each daily record showing a daily volume-weighted average coating VOC content greater than the limitation specified in b)(2)b. 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.

(4) The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emission and material usage limitations outlined in b)(2)a, c)(1) and c)(2). 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) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Coatings applied in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, 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, Lucus, 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, pursuant to Method 24, 40 CFR Part 60, Appendix A, 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.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

b. Emission Limitation:

Volatile Organic Compounds (VOC) shall not exceed 35.4 lb/hour.

Applicable Compliance Method:

Compliance with the above VOC emission limitation shall be determined by multiplying the VOC content of the coating, as applied, by the maximum hourly coating usage rate, as applied, of 6 gallons per hour.

c. Emission Limitation:

Volatile Organic Compounds (VOC) from K001, K002 and K003 combined shall not exceed 26.65 TPY as a rolling 12-month summation.

Applicable Compliance Method:

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

d. Emission Limitation:

The maximum coating usage for emissions units K001, K002 and K003 combined shall not exceed 15,000 gallons per year) based upon a rolling, 12-month summation.

Applicable Compliance Method:

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

e. Emission Limitation:

The maximum solvent usage for cleanup for emissions units K001, K002 and K003 combined shall not exceed 120 gallons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

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

f. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method

When requested by the Ohio EPA, compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

g) Miscellaneous Requirements

None