



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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50 W. Town St., Suite 700
Columbus, Ohio 43215

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

4/6/2009

Certified Mail

Clete Hoersten
Joint Systems Manufacturing Center
1161 Buckeye Road
Lima, OH 45804-1825

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0302020027
Permit Number: P0103887
Permit Type: Initial Installation
County: Allen

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

Dear Permit Holder:

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

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

and Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

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

Cc: U.S. EPA
Ohio EPA-NWDO; Indiana

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

PUBLIC NOTICE
Issuance Of Draft Air Pollution Permit-To-Install
Joint Systems Manufacturing Center

Issue Date: 4/6/2009
Permit Number: P0103887
Permit Type: Initial Installation
Permit Description: Issuance of PTIs for emissions units F002 - Misc. Welding/Grinding; P009 - Flame Cut Plate Cutting; R001 - Service Garage Paint Booth; and R002 - Maintenance Paint Booth.
Facility ID: 0302020027
Facility Location: Joint Systems Manufacturing Center
1155 Buckeye Road,
Lima, OH 45804-1825
Facility Description: Military Armored Vehicle, Tank, and Tank Component Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Donald Waltermeyer at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road or (419)352-8461. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Joint Systems Manufacturing Center has submitted a Permit To Install application for four (4) emissions units (EUs) associated with its Bradley Fighting Vehicle operations. The EUs were installed in the 1979-1983 timeframe. A facility-wide air emissions inventory performed in 2007 identified these 4 EUs as requiring PTIs, and this application has requested federally enforceable limits to restrict emissions of volatile organic compounds (VOC) for two (2) of the EUs (R001 and R002.) Joint Systems is asking for federally enforceable restrictions to avoid PSD permitting requirements.

F002 Misc. Welding/Grinding
P009 Flame Cut Plate Cutting
R001 Service Garage Paint Booth
R002 Maintenance Paint Booth

3. Facility Emissions and Attainment Status:

Joint Systems Manufacturing Center is a major facility for Title V and PSD. The facility is located in Allen County. Allen County was re-designated as an attainment area for ozone (8-hour standard) on 6/15/07.

4. Source Emissions:

F002 400 Miscellaneous Welding/Grinding stations: the facility requested an annual PM10 limit of 4.84 tpy
P009 Flame Cut Plate Cutting operation using LPG: the facility requested an annual NOx limit of 2.94 tpy

R001 – Service Garage Paint Booth and R002 – Maintenance Paint Booth The facility has requested federally enforceable restrictions to limit VOC emissions from R001 and R002 to 27.0 VOC tpy. Identical limits have been written for each of these paint booths: R001 – 13.5 VOC tpy; and R002 – 13.5 VOC tpy.

5. Conclusion:

Potential VOC emissions trigger PSD permitting requirements. By implementing federally enforceable limits to restrict emissions of VOCs, Joint Systems can avoid PSD permitting requirements for emissions units R001 and R002.

6. Please provide additional notes or comments as necessary:

None



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0103887
Facility ID: 0302020027

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

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>PM10</u>	<u>4.84</u>
<u>NOx</u>	<u>2.94</u>
<u>VOC</u>	<u>27.0</u>



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

DRAFT

**Air Pollution Permit-to-Install
for
Joint Systems Manufacturing Center**

Facility ID: 0302020027
Permit Number: P0103887
Permit Type: Initial Installation
Issued: 4/6/2009
Effective: To be entered upon final issuance



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Air Pollution Permit-to-Install
 for
 Joint Systems Manufacturing Center

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0103887

Facility ID: 0302020027

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0302020027

Facility Description: Tanks and Tank Components

Application Number(s): A0035962, A0036449, A0036838

Permit Number: P0103887

Permit Description: Issuance of PTIs for emissions units F002 - Misc. Welding/Grinding; P009 - Flame Cut Plate Cutting; R001 - Service Garage Paint Booth; and R002 - Maintenance Paint Booth.

Permit Type: Initial Installation

Permit Fee: \$800.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 4/6/2009

Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Joint Systems Manufacturing Center
1155 Buckeye Road
Lima, OH 45804-1825

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0103887

Permit Description: Issuance of PTIs for emissions units F002 - Misc. Welding/Grinding; P009 - Flame Cut Plate Cutting; R001 - Service Garage Paint Booth; and R002 - Maintenance Paint Booth.

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

Emissions Unit ID:	F002
Company Equipment ID:	Misc. Welding / Grinding
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P009
Company Equipment ID:	Flame Cut Plate Cutting
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R001
Company Equipment ID:	Service Garage Paint Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R002
Company Equipment ID:	Maintenance Paint Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0103887

Facility ID: 0302020027

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 2.a), Severability Clause
 - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A. 9., Reporting Requirements
 - (5) Standard Term and Condition A. 10., Applicability
 - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A. 14., Public Disclosure
 - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A. 16., Fees
 - (10) Standard Term and Condition A. 17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.



(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:



- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted



(i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.



No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0103887

Facility ID: 0302020027

Effective Date: To be entered upon final issuance

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

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B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0103887

Facility ID: 0302020027

Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. For units R001 and R002, the facility is exempt from the Miscellaneous Metal Parts MACT, Subpart MMMM, because the Lima facility is owned by the U.S. Department of Defense/U.S. Army (and is operated by General Dynamics, a private company), per 40 CFR 63.3881(c)(4).



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

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C. Emissions Unit Terms and Conditions



1. F002, Misc. Welding / Grinding

Operations, Property and/or Equipment Description:

Misc. Welding/Grinding

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	4.85 tons fugitive particulate emissions (PE)/yr
b.	OAC rule 3745-17-08(B)	None [See b)(2)a.]
c.	OAC rule 3745-17-07(B)	None [See b)(2)b.]

(2) Additional Terms and Conditions

a. This facility is not located within an area identified in "Appendix A" of OAC rule 3745-17-08 (it is located outside the City of Lima in Allen County.) Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

c. All PE is assumed to be PM₁₀.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.



f) Testing Requirements

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

a. Emission Limitation: 4.85 tons fugitive PE/year

Applicable Compliance Method: The annual emission limit of PE represents the potential to emit for the source, attenuated by a 70% control efficiency provided by the building. The potential to emit was calculated as follows:

$$E = (\text{maximum weld wire throughput rate, in tpy}) \times EF \times (1-CE)$$

Where:

E = PE rate (tpy)

Maximum weld wire throughput rate = 421 tpy

EF = PM-10 emission factor for welding operations from AP-42 [76.8 lb/ton], Table 12.10-1.

CE = control efficiency of the control equipment (building, assumed to be 70%)

g) Miscellaneous Requirements

(1) None.



2. P009, Flame Cut Plate Cutting

Operations, Property and/or Equipment Description:

Flame Cut Plate Cutting

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	0.62 lb nitrogen oxides (NOx)/hr and 2.72 tons NOx/yr
b.	OAC rule 3745-17-11(B)	None. [See b)(2)a.]
c.	OAC rule 3745-17-07(A)	None. [See b)(2)b.]

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(17).

b. The emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.



f) Testing Requirements

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

a. Emission Limitation: 0.62 lb NOx/hr and 2.72 tons NOx/yr

Applicable Compliance Method: The permittee may demonstrate compliance with the hourly allowable NOx emission limitation by multiplying the emission factor of 13 lbs NOx/1000 gallons of propane [from AP-42, Table 1.5-1 (revised 7/08)] by the maximum propane consumption rate of 48 gallons/hr.

If required, the permittee shall demonstrate compliance with the hourly NOx limitation pursuant to Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly limitation by a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton.

g) Miscellaneous Requirements

(1) None.



3. R001, Service Garage Paint Booth

Operations, Property and/or Equipment Description:

Bldg. 317 - maintenance painting of forklifts, small machinery, etc., air powered spray guns or hand held spray cans

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)	3.45 lbs organic compounds (OC)/hr from coating operations 1100 pounds OC/month from cleanup operations See b)(2)a.
b.	OAC rule 3745-31-05(D)	6.9 tons OC per rolling, 12-month period from coating operations 6.6 tons OC per rolling, 12-month period from cleanup operations See b)(2)b.
c.	OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr See b)(2)c.
d.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule. See b)(2)c.
e.	OAC rule 3745-17-11(C)	See b)(2)d. and c)(1)
f.	OAC rule 3745-21-09(U)(1)(d)	3.5 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
g.	ORC 3704.03(F)(4)(b) OAC rule 3745-114-01	See g)(1)



(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), 3745-17-11(C) and 3745-21-09(U)(1)(d).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD):
 - i. 6.9 tons OC per rolling, 12- month period from coating operations based on a coating usage restriction [See c)(2)] and a maximum coating VOC content of 3.5 lbs/gallon established by OAC rule 3745-21-09(U)(1)(c). For purposes of federal enforceability, a restriction on VOC emissions effectively limits OC emissions.
 - ii. 6.6 tons OC per rolling, 12-month period from cleanup operations based on a coating usage restriction [See c)(3)]. For purposes of federal enforceability, a restriction on OC emissions effectively limits VOC emissions.
- c. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.
- d. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling of particulate emissions from surface coating processes. Paragraph (C) of OAC rule 3745-17-11, and c)(1) of this permit for this emissions unit, shall be federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

c) Operational Restrictions

- (1) The spray coating operation for this emissions unit shall be controlled by a dry particulate filter. The permittee shall follow all of these work practices:
 - a. 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 filtrations system is utilized.
 - b. The permittee shall operate the dry filtration system in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.
 - c. The permittee shall conduct periodic inspections of the dry filtration system to determine whether the device 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 each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy



of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry filtration system while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

- d. The 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.
- e. 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 control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control device is not operating in accordance with such requirements.

Any documentation required under c)(1)a. shall be maintained for not less than five years, and shall be made available to Ohio EPA upon request.

- (2) The maximum annual coating usage rate for this emissions unit shall not exceed 4,000 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

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

Maximum Allowable
Cumulative Coating Usage Rates for R001

Month	Coating Usage (Gallons)
1	1000
1 - 2	1500
1 - 3	1750
1 - 4	2000
1 - 5	2250
1 - 6	2500
1 - 7	2750
1 - 8	3000
1 - 9	3250
1 - 10	3500



1 - 11	3750
1 - 12	4000

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual coating usage limitations shall be based upon a rolling 12-month summation of the coating usage rates.

- (3) The maximum annual cleanup usage rate for this emissions unit shall not exceed 2000 gallons, based upon a rolling, 12-month summation of the monthly cleanup usage rates.

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

Maximum Allowable
Cumulative Cleanup Usage Rates for R001

Month	Cleanup Usage (Gallons)
1	500
1 - 2	750
1 - 3	875
1 - 4	1000
1 - 5	1125
1 - 6	1250
1 - 7	1375
1 - 8	1500
1 - 9	1625
1 - 10	1750
1 - 11	1875
1 - 12	2000

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each month for coating material usage in emissions unit R001:
 - a. the name and identification number of each coating employed;



- b. the volatile organic compound (VOC) content of each coating (excluding water and exempt solvents), as applied, in pounds per gallon [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC₂];
 - c. the number of gallons of each coating employed;
 - d. the OC content of each coating, as applied, in pounds per gallon;
 - e. the OC emission rate for each coating employed [d)(2)c. x d)(2)d.], in pounds;
 - f. the total OC emission rate for all coatings employed [summation of d)(2)e. for all coatings], in pounds or tons;
 - g. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total OC emissions for all coatings employed, in tons;
 - h. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month OC emission rates for all coatings employed, in tons;
 - i. for the first 12 months of operation, following the issuance of this permit, the cumulative coating usage rate, in gallons;
 - j. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month coating usage rate, in gallons.
- (2) The permittee shall collect and record the following each month for cleanup operations in emissions unit R001:
- a. the name and identification number of each cleanup material employed;
 - b. the OC content on each cleanup material employed, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the total OC emissions from all the cleanup materials employed, in pounds [i.e., the sum of d)(3)b. x d)(3)c. for each cleanup material employed], prior to any credit claimed for solvent recycling;
 - e. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total OC emissions for all cleanup material employed, in tons, prior to any credit claimed for solvent recycling;
 - f. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month OC emission rates for all cleanup material employed, in tons, prior to any credit claimed for solvent recycling;
 - g. for the first 12 months of operation, following the issuance of this permit, the cumulative cleanup material usage rate, in gallons; and



- b. All exceedances of the rolling 12-month VOC emission limitation of 6.6 tons from the cleanup operations for emissions unit R001.
- c. All exceedances of the rolling 12-month coating usage of 4000 gallons from the coating operations for emissions unit R001.
- d. All exceedances of the rolling 12-month cleanup material usage of 2000 gallons from the cleanup operations for emissions unit R001.

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

f) Testing Requirements

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

- a. Emission Limitation: 3.45 lbs OC/hour from coating operations and 6.9 tons of OC per rolling, 12 month period

Applicable Compliance Method: The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

*The potential to emit is based on a VOC content of 3.45 lbs/gallon and a maximum usage rate of 1.0 gallon/hour.

The annual emission limitation was established by multiplying the hourly limitation by a maximum operating schedule of 4000 hours/year and dividing by 2000 lbs/ton. Compliance with the annual limitation shall be determined based upon the recordkeeping requirements specified in section d)(1) of this permit.

- b. Emission Limitation: 1100 lbs OC/month of cleanup material, excluding water and exempt solvents and 6.6 tons of OC per rolling, 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section d)(2) or d)(3) for this emissions unit.

- c. Emission Limitation: 0.551 lb PE/hr

Applicable Compliance Method: The permittee may demonstrate compliance with the hourly allowable PE limitation by utilizing the following equation:

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

where:

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



TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used [assumed to be 40%, considering AP-42, Table 4.2.2.11-1 (air atomized spray)]

CE = control efficiency of the control equipment (assumed to be 99%)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to OAC rule 3745-17-03(B)(10).

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

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible emissions limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

- e. Emission Limitation: 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section d)(1) for this emissions unit.

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

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic air compound will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant, as defined in OAC rule 3745-114-01, to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.



4. R002, Maintenance Paint Booth

Operations, Property and/or Equipment Description:

Bldg.322 – maintenance painting of forklifts, small machinery, etc., air powered spray guns or hand held spray cans

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)	3.45 lbs organic compounds (OC)/hr from coating operations 1100 pounds OC/month from cleanup operations See b)(2)a.
b.	OAC rule 3745-31-05(D)	6.9 tons OC per rolling, 12-month period from coating operations 6.6 tons OC per rolling, 12-month period from cleanup operations See b)(2)b.
c.	OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr See b)(2)c.
d.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule. See b)(2)c.
e.	OAC rule 3745-17-11(C)	See b)(2)d. and c)(1)
f.	OAC rule 3745-21-09(U)(1)(d)	3.5 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
g.	ORC 3704.03(F)(4)(b) OAC rule 3745-114-01	See g)(1)



(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), 3745-17-11(C) and 3745-21-09(U)(1)(d).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD):
 - i. 6.9 tons OC per rolling, 12- month period from coating operations based on a coating usage restriction [See c)(2)] and a maximum coating VOC content of 3.5 lbs/gallon established by OAC rule 3745-21-09(U)(1)(c). For purposes of federal enforceability, a restriction on VOC emissions effectively limits OC emissions.
 - ii. 6.6 tons OC per rolling, 12-month period from cleanup operations based on a coating usage restriction [See c)(3)]. For purposes of federal enforceability, a restriction on OC emissions effectively limits VOC emissions.
- c. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.
- d. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling of particulate emissions from surface coating processes. Paragraph (C) of OAC rule 3745-17-11, and c)(1) of this permit for this emissions unit, shall be federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

c) Operational Restrictions

- (1) The spray coating operation for this emissions unit shall be controlled by a dry particulate filter. The permittee shall follow all of these work practices:
 - a. 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 filtrations system is utilized.
 - b. The permittee shall operate the dry filtration system in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.
 - c. The permittee shall conduct periodic inspections of the dry filtration system to determine whether the device 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 each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy



of the manufacturer’s recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry filtration system while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer’s recommendations.

- d. The 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.
- e. 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 control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control device is not operating in accordance with such requirements.

Any documentation required under c)(1)a. shall be maintained for not less than five years, and shall be made available to Ohio EPA upon request.

- (2) The maximum annual coating usage rate for this emissions unit shall not exceed 4,000 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

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

Maximum Allowable
Cumulative Coating Usage Rates for R002

Month	Coating Usage (Gallons)
1	1000
1 – 2	1500
1 – 3	1750
1 – 4	2000
1 – 5	2250
1 – 6	2500
1 – 7	2750
1 – 8	3000
1 – 9	3250
1 – 10	3500



1 – 11	3750
1 – 12	4000

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual coating usage limitations shall be based upon a rolling 12-month summation of the coating usage rates.

- (3) The maximum annual cleanup usage rate for this emissions unit shall not exceed 2000 gallons, based upon a rolling, 12-month summation of the monthly cleanup usage rates.

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

Maximum Allowable
Cumulative Cleanup Usage Rates for R002

Month	Cleanup Usage (Gallons)
1	500
1 – 2	750
1 – 3	875
1 – 4	1000
1 – 5	1125
1 – 6	1250
1 – 7	1375
1 – 8	1500
1 – 9	1625
1 – 10	1750
1 – 11	1875
1 – 12	2000

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each month for coating material usage in emissions unit R002:
 - a. the name and identification number of each coating employed;



- b. the volatile organic compound (VOC) content of each coating (excluding water and exempt solvents), as applied, in pounds per gallon [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC₂];
 - c. the number of gallons of each coating employed;
 - d. the OC content of each coating, as applied, in pounds per gallon;
 - e. the OC emission rate for each coating employed [d)(2)c. x d)(2)d.], in pounds;
 - f. the total OC emission rate for all coatings employed [summation of d)(2)e. for all coatings], in pounds or tons;
 - g. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total OC emissions for all coatings employed, in tons;
 - h. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month OC emission rates for all coatings employed, in tons;
 - i. for the first 12 months of operation, following the issuance of this permit, the cumulative coating usage rate, in gallons;
 - j. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month coating usage rate, in gallons.
- (2) The permittee shall collect and record the following each month for cleanup operations in emissions unit R002:
- a. the name and identification number of each cleanup material employed;
 - b. the OC content on each cleanup material employed, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the total OC emissions from all the cleanup materials employed, in pounds [i.e., the sum of d)(3)b. x d)(3)c. for each cleanup material employed], prior to any credit claimed for solvent recycling;
 - e. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total OC emissions for all cleanup material employed, in tons, prior to any credit claimed for solvent recycling;
 - f. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month OC emission rates for all cleanup material employed, in tons, prior to any credit claimed for solvent recycling;
 - g. for the first 12 months of operation, following the issuance of this permit, the cumulative cleanup material usage rate, in gallons; and



- b. All exceedances of the rolling 12-month VOC emission limitation of 6.6 tons from the cleanup operations for emissions unit R002.
- c. All exceedances of the rolling 12-month coating usage of 4000 gallons from the coating operations for emissions unit R002.
- d. All exceedances of the rolling 12-month cleanup material usage of 2000 gallons from the cleanup operations for emissions unit R002.

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

f) Testing Requirements

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

- a. Emission Limitation: 3.45 lbs OC/hour from coating operations and 6.9 tons of VOC per rolling, 12 month period

Applicable Compliance Method: The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

*The potential to emit is based on a VOC content of 3.45 lbs/gallon and a maximum usage rate of 1.0 gallon/hour.

The annual emission limitation was established by multiplying the hourly limitation by a maximum operating schedule of 4000 hours/year and dividing by 2000 lbs/ton. Compliance with the annual limitation shall be determined based upon the recordkeeping requirements specified in section d)(1) of this permit.

- b. Emission Limitation: 1100 lbs OC/month of cleanup material, excluding water and exempt solvents and 6.6 tons of OC per rolling, 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section d)(2) or d)(3) for this emissions unit.

- c. Emission Limitation: 0.551 lb PE/hr

Applicable Compliance Method: The permittee may demonstrate compliance with the hourly allowable PE limitation by utilizing the following equation:

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

where:

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



TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used [assumed to be 40%, considering AP-42, Table 4.2.2.11-1 (air atomized spray)]

CE = control efficiency of the control equipment (assumed to be 99%)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to OAC rule 3745-17-03(B)(10).

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

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible emissions limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

- e. Emission Limitation: 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section d)(1) for this emissions unit.

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

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic air compound will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant, as defined in OAC rule 3745-114-01, to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.