State of Ohio Environmental Protection Agency

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4/17/2009

Mr. Bill Plate
Autoplas
560 Goodrich Rd.
Bellevue, OH 44883

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0339010151
Permit Number: P0087246
Permit Type: Renewal
County: Huron

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.state.oh.us/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of $70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-NWDO

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

Air Pollution Permit-to-Install and Operate

for

Autoplas

Facility ID:	0339010151
Permit Number:	P0087246
Permit Type:	Renewal
Issued:	4/17/2009
Effective:	4/17/2009
Expiration:	4/17/2014

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
Autoplas

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Authorization

Facility ID: 0339010151
Application Number(s): A0018177
Permit Number: P0087246
Permit Description: Renewal FEPTIO for 13 Paint Spray Booths
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 4/17/2009
Effective Date: 4/17/2009
Expiration Date: 4/17/2014
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15
This document constitutes issuance to:

Autoplas
560 GOODRICH RD
BELLEVUE, OH 44811

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

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

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0087246
Permit Description: Renewal FEPTIO for 13 Paint Spray Booths

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

Emissions Unit ID:	**R013**
Company Equipment ID:	Paint Spray Booth
Superseded Permit Number:	03-13652
General Permit Category and Type:	Not Applicable

Group Name: Paint Spray Booths #1-12

Emissions Unit ID:	**R001**
Company Equipment ID:	BOOTH #1-COATING PLASTIC PARTS
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R002**
Company Equipment ID:	BOOTH #2 - COATING PLASTIC PARTS
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R003**
Company Equipment ID:	BOOTH #3 - COATING PLASTIC PARTS
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R004**
Company Equipment ID:	BOOTH #4-COATING PLASTIC PARTS
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R005**
Company Equipment ID:	BOOTH #5 - COATING PLASTIC PARTS
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R006**
Company Equipment ID:	BOOTH #6 - COATING PLASTIC PARTS
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R007**
Company Equipment ID:	BOOTH #7 - COATING PLASTIC PARTS
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R008**
Company Equipment ID:	BOOTH #8-COATING PLASTIC PARTS
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R009**
Company Equipment ID:	BOOTH #9-COATING PLASTIC PARTS
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R010**
Company Equipment ID:	BOOTH #10-COATING PLASTIC PARTS
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R011**

Company Equipment ID:	BOOTH #11-COATING PLASTIC PARTS
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R012**
Company Equipment ID:	BOOTH #12-COATING PLASTIC PARTS
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 Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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) None.

C. Emissions Unit Terms and Conditions

1. R013, Paint Spray Booth

Operations, Property and/or Equipment Description:

2 Paint Spray Booths with Curing Oven

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

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

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

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

a. d)(5), d)(6).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<u>Paint Coating Operations</u> 2.64 lbs organic compounds OC/hr and 11.56 tons OC/yr <u>Clean-Up Operations</u> 1,107 lbs NVOC/month, 6.64 tons NVOC/yr from cleanup operations for R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined [See c)(1), c)(2), and c)(3)] See b)(2)a.
b.	OAC rule 3745-31-05(D)	90.0 tons OC per rolling, 365-day period from all the emission units identified in b)(2)b. 9.9 tons of any single HAP emission per rolling, 12-month period from all the emission units identified in b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		24.9 tons of total combined HAP emissions per rolling, 12-month period from all the emission units identified in b)(2)b.
c.	OAC rule 3745-21-07(G)(1) OAC rule 3745-21-07(M)(4)	OC emissions from curing oven operations shall not exceed 15 lbs per day [See b)(2)c and b)(2)i.]
d.	OAC rule 3745-21-07(G)(2)	See c)(1).
e.	OAC rule 3745-17-07(A)	See b)(2)e. and b)(2)g.
f.	OAC rule 3745-17-11(B)	See b)(2)f.
g.	OAC rule 3745-17-11(C)	See b)(2)h. and c)(4)

(2) Additional Terms and Conditions

a. The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D). The requirements of this rule also includes compliance with the requirements of OAC rule 3745-21-07(G)(1) that OC emissions from curing oven operations shall not exceed 15 pounds per day.

b. This permit establishes the following federally enforceable emission limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:

i. 90.00 tons OC per rolling, 12-month period

ii. 9.9 tons of any single HAP per rolling, 12-month period

iii. 24.9 tons of total combined HAP emissions per rolling, 12-month period

The federally enforceable emission limitations are being established for purposes of avoiding Title V and Maximum Achievable Control Technology (MACT) requirements. For purposes of federally enforceability, a restriction on OC effectively restricts volatile organic compounds.

Rolling OC limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 were established in Permit to Install (PTI) #03-8830 issued on 8-30-95 and modified on 8-27-97, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable OC restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability, OC limitations effectively restrict VOC emissions.

c. The requirement of OAC rule 3745-21-07(G)(1) that OC emissions shall not exceed 3 pounds per hour from curing oven operations is less stringent that the emission limitation of 2.64 pounds OC per hour for the entire coating line established pursuant to OAC rule 3745-31-05(A)(3).

d. The hourly and annual emission limitations from coating operations represent the potential to emit for this emissions unit. Therefore, no monitoring, record keeping,

or reporting requirements are necessary to ensure compliance with this emission limitations.

e. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

f. 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 since the facility is located in Huron County, which is identified as a P- county.

g. 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)(4) 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.

h. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

i. On February 18, 2008, Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The rule rescindment and new rule [OAC rule 3745-21-7(M)(4)] shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07(M)(4), the requirement to comply with OAC rule 3745-21-07 (G) (1) still exists as part of the federally-approved SIP of Ohio.

c) Operational Restrictions

(1) The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.

On February 18, 2008, Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirements of OAC rule 3745-21-07(G)(2) still exists as part of the federally-approved SIP of Ohio.

(2) The use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.

(3) The use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit is prohibited.

(4) The spray coating operation for this emissions unit shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices. 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 control devices with any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.

b. The permittee shall operate the control devices 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 control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the 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 control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

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

e. In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the 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 devices are not operating in accordance with such requirements.

Any documentation required under c(4)a. shall be maintained for not less than five years, and shall be made available to Ohio EPA upon request.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for this emissions unit for purposes of demonstrating compliance with the 15 lbs OC/day emission limitation for the curing oven operations.

For purposes of calculating the OC emission rates from the curing oven, the permittee shall utilize the maximum percentage of the OC employed in the spray booths that are emitted uncontrolled from the booths. The remaining percentage value of the OC employed in the paint booths shall be considered to be the oven emissions from this

emissions unit. In the absence of obtaining values from the results of emission testing, the permittee shall utilize a value of 80% as the maximum percentage of the OC employed in this emissions unit that are emitted uncontrolled from the booths. The remaining 20% of the OC employed in the spray booths shall be considered to be the oven emissions from this emissions unit.

a. the company name and identification for each coating employed;

b. the OC content of each coating, as applied, in lbs/gallon;

c. the number of gallons of each coating employed;

d. the OC emission rate for each coating[d)(1)c. x d)(1)d.), in pounds

e. the total OC emission rate for all coatings [summation of d)(1)e.], in pounds

f. the total OC emission rate for the curing oven calculated by multiplying the maximum percentage of the OC emissions attributed to the oven (0.20 - as defined above) by the total OC emission rate for all coatings employed (value of d)(1)e. resulting in pounds OC per day emitted from the oven.

(2) The permittee shall collect and record the following information each day for coating material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013, combined:

a. the company name and identification for each coating employed;

b. documentation of whether or not each coating employed is a photochemically reactive material as defined in OAC rule 3745-21-01;

c. the OC content of each coating, as applied, in lbs/gallon;

d. the number of gallons of each coating employed;

e. the OC emission rate for each coating [d)(2)c. x d)(2)d.], in pounds or tons

f. the total OC emission rate for all coatings [summation of d)(2)e.], in pounds or tons

g. the rolling, 365-day summation of the total OC emission rate, in tons.

(3) The permittee shall collect and record the following each month for cleanup material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013, combined:

a. the company name and identification for each cleanup material employed;

b. documentation of whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01;

c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01;

d. documentation of whether or not each cleanup material employed is a HAP as defined in OAC rule 3745-31-01;

e. the OC content of each cleanup material employed, in lbs/gallon;

f. the number of gallons of each cleanup material employed;

g. the OC emission rate for each cleanup material [d)(3)c. x d)(3)d.], in pounds

h. the total OC emission rate for all cleanup materials [summation of d)(3)e.] in pounds or tons per month; and

i. the annual, year-to-date OC emissions from all cleanup materials employed [sum of d)(3)h. for each calendar month to date from January to December].

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

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

(4) The permittee shall collect and record the following information regarding HAP emissions each month for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013, combined:

a. the company identification of each coating employed;

b. the lbs/gallon of each individual HAP in each coating, as applied;

c. the number of gallons of each coating employed per month;

d. the emission rate for each individual HAP from each coating employed [d)(4)b. x d)(4)c.], in pounds;

e. the total emission rate for each individual HAP from all coatings employed [summation of d)(4)d.] in tons/month;

f. the total HAP emission rate for the combination of all HAPs from all coatings employed [summation of d)(4)e.] for all HAPs, in tons/month;

g. the rolling, 12-month emission limitations for each individual HAP and the combination of all HAPs, in tons.

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

(5) The permit to install for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 ,combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to

install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl ethyl ketone
TLV (mg/m3): 589.78
Maximum Hourly Emission Rate (lbs/hr): 12.74
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.31
MAGLC (ug/m3): 14.05

Pollutant: 2-butoxyethanol
TLV (mg/m3): 96.66
Maximum Hourly Emission Rate (lbs/hr): 6.30
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.14
MAGLC (mg/m3): 2.31

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters; the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

(6) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

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

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

i. the rolling, 365-day OC emission limitation;

ii. the rolling,12-month single HAP and combined HAPs emission limitations;

iii. the monthly NVOC emission limitation from cleanup operations; and

iv. the daily OC emission limitation from the curing oven.

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

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

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

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) 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 section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitations:
2.64 lbs OC/hour and 11.56 tons OC/yr

Applicable Compliance Method
The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (0.454 gallons per hour) by the maximum OC content of all the coatings (5.80 pounds per gallon).

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

The annual allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly emissions of 2.64 lbs by a maximum operating schedule of 8760 hrs/yr divided by 2000 lbs/ton. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed.

b. Emission Limitation
90.0 tons OC per rolling, 365-day period from all the emission units identified in b)(2)b.

Applicable Compliance Method
Compliance shall be demonstrated by the monitoring and record keeping in section d)(2).

c. Emission Limitation
9.9 tons of any single HAP emission per rolling, 12-month period from all the emission units identified in b)(2)b.

Applicable Compliance Method
Compliance shall be demonstrated by the monitoring and record keeping in section d)(4).

d. Emission Limitation
24.9 tons of total combined HAP emissions per rolling, 12-month period from all the emission units identified in b)(2)b.

Applicable Compliance Method
Compliance shall be demonstrated by the monitoring and record keeping in section d)(4).

e. Emission Limitation
1,107 lbs NVOC/month, 6.64 tons NVOC/yr from cleanup operations for R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined.

Applicable Compliance Method
Compliance shall be demonstrated by the monitoring and record keeping in section d)(3).

f. Emission Limitation
15 lbs OC/day associated with the oven emissions in this emissions unit

Applicable Compliance Method
Compliance shall be demonstrated by the monitoring and record keeping in section d)(1).

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group - Paint Spray Booths #1-12: R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012,

EU ID	Operations, Property and/or Equipment Description
R001	Paint Spray Booth #1 with Filter Bank
R002	Paint Spray Booth #2 with Filter Bank
R003	Paint Spray Booth #3 with Filter Bank
R004	Paint Spray Booth #4 with Filter Bank
R005	Paint Spray Booth #5 with Filter Bank
R006	Paint Spray Booth #6 with Filter Bank
R007	Paint Spray Booth #7 with Filter Bank
R008	Paint Spray Booth #8 with Filter Bank
R009	Paint Spray Booth #9 with Filter Bank
R010	Paint Spray Booth #10 with Filter Bank
R011	Paint Spray Booth #11 with Filter Bank
R012	Paint Spray Booth #12 with Filter Bank

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

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

a. b)(1)b., b)(2)b., d)(1), d)(3), e)(1), f)(1)b., f)(1)c., and f)(1)d.

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

a. d)(4) and d)(5).

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)	<u>Paint Coating Operations</u> 1.32 lbs organic compounds (OC)/hr and 5.78 tons OC/yr from each coating operation individually <u>Clean-Up Operations</u> 1,107 lbs non-volatile organic compounds (NVOC)/month, 6.64 tons

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		NVOC/yr from cleanup operations for R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013, combined [See c)(1), c)(2) and c)(3)] See b)(2)a.
b.	OAC rule 3745-31-05(D)	90.0 tons OC per rolling, 365-day period from all the emission units identified in b)(2)b. 9.9 tons of any single hazardous air pollutant (HAP) emission per rolling, 12-month period from all the emission units identified in b)(2)b. 24.9 tons of total combined HAP emissions per rolling, 12-month period from all the emission units identified in b)(2)b.
c.	OAC rule 3745-21-07(G)(2)	See c)(1).
d.	OAC rule 3745-17-07(A)	See b)(2)d.
e.	OAC rule 3745-17-11(B)	See b)(2)e.
f.	OAC rule 3745-17-11(C)	See b)(2)g. and c)(4)

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).

b. This permit establishes the following federally enforceable emission limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:

i. 90.00 tons OC per rolling, 12-month period

ii. 9.9 tons of any single HAP per rolling, 12-month period

iii. 24.9 tons of total combined HAP emissions per rolling, 12-month period

The federally enforceable emission limitations are being established for purposes of avoiding Title V and Maximum Achievable Control Technology (MACT) requirements. For purposes of federally enforceability, a restriction on OC effectively restricts volatile organic compounds.

Rolling OC limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 were established in Permit to Install (PTI) #03-8830 issued on 8-30-95 and modified on 8-27-97, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish

federally enforceable OC restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability, OC limitations effectively restrict VOC emissions.

c. The hourly and annual emission limitations from coating operations represent the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitations.

d. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

e. 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 since the facility is located in Huron County, which is identified as a P- county.

f. 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)(4) 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.

g. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

c) Operational Restrictions

(1) The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.

On February 18, 2008, Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirements of OAC rule 3745-21-07(G)(2) still exists as part of the federally-approved SIP of Ohio.

(2) The use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.

(3) The use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit is prohibited.

(4) The spray coating operation for this emissions unit shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices. 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 control devices with any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.

b. The permittee shall operate the control devices 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 control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the 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 control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

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

e. In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the 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 devices are not operating in accordance with such requirements.

Any documentation required under c(4)a. shall be maintained for not less than five years, and shall be made available to Ohio EPA upon request.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for coating material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:

a. the company name and identification for each coating employed;

b. documentation of whether or not each coating employed is a photochemically reactive material as defined in OAC rule 3745-21-01;

c. the OC content of each coating, as applied, in lbs/gallon;

d. the number of gallons of each coating employed;

e. the OC emission rate for each coating [d)(1)c. x d)(1)d.], in pounds;

f. the total OC emission rate for all coatings [summation of d)(1)e.], in pounds or tons;

g. the rolling, 365-day OC emissions rate, in tons.

(2) The permittee shall collect and record the following information each month for cleanup material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013, combined:

a. the company name and identification for each cleanup material employed;

b. documentation of whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01;

c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01;

d. documentation of whether or not each cleanup material employed is a HAP as defined in OAC rule 3745-31-01.

e. the OC content of each cleanup material employed, in lbs/gallon;

f. the number of gallons of each cleanup material employed;

g. the OC emission rate for each cleanup material [d)(2)c. x d)(2)d.], in pounds;

h. the total OC emission rate for all cleanup materials [summation of d)(2)e.], in tons per month;

i. the annual, year-to-date OC emissions from all cleanup materials employed (sum of d)(2)h. for each calendar month to date from January to December).

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

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

(3) The permittee shall collect and record the following information regarding HAP emissions each month for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013, combined:

a. the company identification of each coating employed;

b. the lbs/gallon of each individual HAP in each coating, as applied;

c. the number of gallons of each coating employed per month;

d. the emission rate for each individual HAP from each coating employed [d)(3)b. x d)(3)c.], in pounds;

e. the total emission rate for each individual HAP from all coatings employed [summation of d)(3)d.], in tons/month;

f. the total HAP emission rate for the combination of all HAPs from all coatings employed [summation of d)(3)e.] for all HAPs, in tons/month;

g. the rolling, 12-month emission limitations for each individual HAP and the combination of all HAPs, in tons.

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

(4) The permit to install for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl ethyl ketone
TLV (mg/m3): 589.78
Maximum Hourly Emission Rate (lbs/hr): 12.74
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.31
MAGLC (ug/m3): 14.05

Pollutant: 2-butoxyethanol
TLV (mg/m3): 96.66
Maximum Hourly Emission Rate (lbs/hr): 6.30
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.14
MAGLC (mg/m3): 2.31

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters; the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most

recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

(5) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

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

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

i. the rolling, 365-day OC emission limitation;

ii. the rolling,12-month single HAP and combined HAPs emission limitations;

iii. the monthly NVOC emission limitation from cleanup operations; and

iv. the daily OC emission limitation from the curing oven.

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

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

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

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) 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 section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitations:
1.32 lbs OC/hour and 5.78 tons OC/yr

Applicable Compliance Method:
The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (0.227 gallons per hour) by the maximum OC content of all the coatings (5.80 pounds per gallon).

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

The annual allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly emissions of 1.32 lbs by a maximum operating schedule of 8760 hrs/yr divided by 2000 lbs/ton. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed.

b. Emission Limitation
90.0 tons OC per rolling, 365-day period from all the emission units identified in b)(2)b.

Applicable Compliance Method
Compliance shall be demonstrated by the monitoring and record keeping in section d)(1).

c. Emission Limitation
9.9 tons of any single HAP emission per rolling, 12-month period from all the emission units identified in b)(2)b.

Applicable Compliance Method
Compliance shall be demonstrated by the monitoring and record keeping in section d)(3).

d. Emission Limitation
24.9 tons of total combined HAP emissions per rolling, 12-month period from all the emission units identified in b)(2)b.

Applicable Compliance Method
Compliance shall be demonstrated by the monitoring and record keeping in section d)(3).

e. Emission Limitation
1,107 lbs NVOC/month, 6.64 tons NVOC/yr from cleanup operations for R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013, combined

Applicable Compliance Method
Compliance shall be demonstrated by the monitoring and record keeping in section d)(2).

g) Miscellaneous Requirements

(1) None.