State of Ohio Environmental Protection Agency

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Certified Mail

5/12/2009

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

Thomas Von Bargen
Armor Metal Group
4600 N. Mason-Montgomery Road
Mason, OH 45040-9176

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1483090487
Permit Number: P0104357
Permit Type: OAC Chapter 3745-31 Modification
County: Warren

Dear Permit Holder:

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

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

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

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

If you have any questions regarding this permit, please contact the Hamilton County Dept. of Environmental Services. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern

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

Cc: HCDOES

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

Air Pollution Permit-to-Install and Operate
for
Armor Metal Group

Facility ID:	1483090487
Permit Number:	P0104357
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	5/12/2009
Effective:	5/12/2009
Expiration:	5/12/2014

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
Armor Metal Group

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Authorization

Facility ID: 1483090487
Application Number(s): A0036710, A0037257
Permit Number: P0104357
Permit Description: Chapter 31 Modification to K003 and K005 to increase rolling, 12-month VOC emissions in K003 and rolling, 12-month usage restrictions in K003 & K005; coating VOC content restricitons; addition of structural paint booths.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $400.00
Issue Date: 5/12/2009
Effective Date: 5/12/2009
Expiration Date: 5/12/2014
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Armor Metal Group
4600 N. Mason-Montgomery Road
Mason, OH 45040-9176

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0104357
Permit Description: Chapter 31 Modification to K003 and K005 to increase rolling, 12-month VOC emissions in K003 and rolling, 12-month usage restrictions in K003 & K005; coating VOC content restricitons; addition of structural paint booths.

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

Emissions Unit ID:	**K003**
Company Equipment ID:	Bay B Compliant
Superseded Permit Number:	P0103801
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K005**
Company Equipment ID:	HB Compliant
Superseded Permit Number:	P0103801
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

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

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

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

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

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

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

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

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

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

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

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

   This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Hamilton County Dept. of Environmental Services in accordance

with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) 2., 3., 4., 5., & 6.

2. The allowable emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001 (Bay A – Compliant Coatings), K002 (Bay A – Noncompliant coatings), K003 (Bay B – Compliant Coatings), K004 (Bay B – Noncompliant coatings), K005 (High Bay – Compliant Coatings), K006 (High Bay – Noncompliant coatings), P001 (Plasma Cutter), and P002 (Diesel Generator) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be determined based upon a rolling, 12-month summation.

3. The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)[1] that are applied in the emissions unit:

   a) the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;

   b) the name/identification of each individual HAP contained in each material applied (and identified in Aa@ above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;

   c) the number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;

   d) for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of Ab@ times Ac@ for all the materials applied during the month, divided by 2,000 pounds;

   e) the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from Ad@ above;

   f) for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in Ad@ above, for the present month plus the previous 11 months of operation, in ton(s); and

   g) the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in Ae@ above, for the present month plus the previous 11 months of operation, in ton(s).

[1]A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

4. The permittee shall submit quarterly deviation (excursion) reports for the following emissions unit(s) 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:

Emissions unit IDs	Term & Condition
K001, K002, K003 K004, K005, K006 P001, P002	B.2.

   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).

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

   a) Emission Limitations:

      The allowable emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions unit K001 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs as specified in 2. above. Compliance with the above limitations shall be determined based upon a rolling, 12-month summation.

      Applicable Compliance Method:

      Compliance with the HAP emissions limitations shall be demonstrated by the methods outlined in the recordkeeping requirements in 3. above.

6. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart HHHHHH: K003 and K005. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District Office or local air agency.

C. Emissions Unit Terms and Conditions

1. **K003, Bay B Compliant**

Operations, Property and/or Equipment Description:

Misc. Metal Parts Spray Painting, Bay B - Compliant Coatings

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

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

a. d(8).

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) Synthetic Minor for VOC and HAPs to avoid Non-Attainment New Source Review, Title V and MACT	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation, from miscellaneous metals parts coating and cleanup. See Section B.2., b)(2)a., b)(2)b. and b)(2)c.
b.	OAC rule 3745-31-05(D)	See b)(2)d.
c.	OAC rule 3745-17-11(C)	See b)(2)e., c)(1) and c)(2).
d.	OAC rule 3745-21-09(U)(1)(d) for coatings dried at temperatures not exceeding 200 degrees Fahrenheit	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
e.	40 CFR Part 63, Subpart HHHHHH (40 CFR 63.11169-11180) [In accordance with 40 CFR 63.11180, this emissions unit is a “miscellaneous surface coating	See c)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	operation" applying coatings containing "target HAPs" and employs "cleaning materials" at an existing "miscellaneous surface coating facility" subject to the control measures specified in this section.]	
f.	40 CFR 63.1-16 (40 CFR 63.11174)	Table 1 to Subpart HHHHHH of Part 63 – Applicability of General Provisions to Subpart HHHHHH of Part 63 shows which parts of the General Provisions in 40 CFR 63.1-16 apply.

(2) Additional Terms and Conditions

a. Coatings applied in the coating operations shall not exceed 1.0 pound VOC per gallon of coating, excluding water and exempt solvents.

b. Cleanup materials applied in the cleanup operations shall not exceed 6.72 pounds VOC per gallon of cleanup material.

c. The maximum annual coating usage for this emissions unit shall not exceed 16,790 gallons, excluding water and exempt solvents, based upon a rolling, 12-month summation of the coating usage figures. The maximum annual cleanup material usage for this emissions unit shall not exceed 447 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage and cleanup material usage upon issuance of this permit.

d. Federally Enforceable Permit to Install and Operate (FEPTIO) P0104357 for this emissions unit takes into account the following voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. The emissions of VOC from this emissions unit shall not exceed 9.9 tons per year.

e. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

c) Operational Restrictions

(1) The permittee shall install, operate, and maintain a dry particulate filter system for the surface coating operations in accordance with the manufacturer=s recommendations,

instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

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

(3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart HHHHHH, including the following sections:

a.	63.11173(e)(1), (f), and (g)(2)	painter training and certification
b.	63.11173(e)(2)(i) and either	
	(e)(2)(ii), (e)(2)(iii), or (e)(2)(iv)	spray booth
c.	63.11173(e)(3)	spray equipment
d.	63.11173(e)(4)	spray equipment cleaning

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

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

b. the mass of VOC per volume of each coating, excluding water and exempt solvents, as applied, calculated as follows:

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

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

where:

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

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

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

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

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

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

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

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

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

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

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific Agallons/year@ and/or Atons/year@ limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

(2) The permittee shall collect and record the following information each month for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the mass of VOC per volume of each cleanup material employed, in pounds of VOC per gallon;

c. the volume, in gallons, of each coating employed, excluding water and exempt solvents and the volume, in gallons, of each cleanup material employed;

d. the rolling, 12-month summation of the coating usage, in gallons, and the rolling, 12-month summation of the cleanup material usage, in gallons, for the present month plus the previous 11 months of operation;

e. the total VOC emissions from all the materials employed, in ton(s), i.e., for VOCs from coating usage, the sum of d)(1)b. multiplied by d)(2)c. for each coating applied during the month, divided by 2,000 pounds and for VOCs from cleanup material usage, the sum of d)(2)b. multiplied by d)(2)c. for each cleanup material applied during the month, divided by 2,000 pounds; and

f. the total VOC emissions during the rolling, 12-month period, i.e., the summation of total VOC emissions from coatings and cleanup materials, as recorded in e. above, for the present month plus the previous 11 months of operation, in ton(s).

(3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer=s recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer=s recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer=s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(8) Modeling to demonstrate compliance with, the AToxic Air Contaminant Statute@, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit=s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified FEPTIO 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 to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

(9) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart HHHHHH, including the following sections:

a.	63.11177(a)	painter certification
b.	63.11177(b)	filter efficiency
c.	63.11177(c)	spray gun equivalency
d.	63.11177(d)	copies of notifications and reports submitted
e.	63.11177(g)	records of deviations from requirements

If you are the owner or operator of an affected source, you must maintain copies of the records specified in 63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

e) Reporting Requirements

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

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

a. all deviations (excursions) of the following emission limitations, VOC content 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:

The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation, from miscellaneous metals parts coating and cleanup; and

b. all exceedances of the rolling, 12-month coating and/or cleanup material usage limitations.

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).

(3) The permittee shall submit notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart HHHHHH, per the following sections. The owner or operator of an existing source may certify in the Initial Notification that the source is already in compliance and that the Initial

Notification also serves as the Notification of Compliance Status pursuant to requirements in 63.11175(a)(8):

a. 63.11175(a)(1) Initial Notification for an existing source (January 11, 2010)

b. 63.11175(b) Notification of Compliance Status (March 11, 2011)

c. 63.11176(a) Annual Notification of Changes Report

f) Testing Requirements

(1) Compliance with the emission limitations and voluntary restrictions in b) of these terms and conditions shall be determined in accordance with the following method(s) identified below and in B.5. of this permit:

a. Emission Limitations

Coatings applied in the coating operations shall not exceed 1.0 pound VOC per gallon of coating, excluding water and exempt solvents.

Cleanup materials applied in the cleanup operations shall not exceed 6.72 pounds VOC per gallon of cleanup material.

Applicable Compliance Method

OAC rule 3745-21-10(B) shall be used to determine the VOC contents of each coating, thinner, additive, cleanup material, and other material applied. If pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or Method 24A cannot be used, the permittee shall notify the Administrator of USEPA and shall use formulation data for the material to demonstrate compliance until USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

b. Emission Limitation and Usage Restrictions

The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 9.9 tons per year (TPY), based on a rolling, 12-month summation, from miscellaneous metals parts coating and cleanup.

The maximum annual coating usage for this emissions unit shall not exceed 16,790 gallons, based upon a rolling, 12-month summation of the coating usage figures.

The maximum annual cleanup material usage for this emissions unit shall not exceed 447 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.

Applicable Compliance Method

Compliance with the emission limitation and usage restrictions shall be demonstrated by the methods outlined in the recordkeeping requirements in d)(2) above.

The VOC emission limitation was established using information provided by the permittee in PTIO application A0036710 for FEPTIO P0104357 in the following equations:

16,790 gal coatings – H2O and exempt solvents x 1.0 lbs VOC/gal coatings – H2O and exempt solvents x 1 Ton/2000 lbs = 8.40 TPY VOC.

447 gal cleanup materials/yr x 6.72 lbs VOC/gal cleanup materials x 1 Ton/2000 lbs = 1.50 TPY VOC

Total 8.40 TPY VOC + 1.50 TPY VOC = 9.9 TPY VOC emission limitation.

c. Control Measures

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

Applicable Compliance Methods

Compliance with the dry particulate filter control measures shall be demonstrated by the methods outlined in the recordkeeping requirements in d)(3) through d)(7) above.

g) Miscellaneous Requirements

(1) None.

2. **K005, HB Compliant**

Operations, Property and/or Equipment Description:

Misc. Metal Parts Spray Painting, High Bay - Compliant Coatings

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

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

a. d(8).

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) Synthetic Minor for VOC and HAPs to avoid Non-Attainment New Source Review, Title V and MACT	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 8.16 tons per year (TPY), based on a rolling, 12-month summation, from miscellaneous metals parts coating and cleanup. See Section B.2., b)(2)a., b)(2)b. and b)(2)c.
b.	OAC rule 3745-31-05(D)	See b)(2)d.
c.	OAC rule 3745-17-11(C)	See b)(2)e., c)(1) and c)(2).
d.	OAC rule 3745-21-09(U)(1)(d) for coatings dried at temperatures not exceeding 200 degrees Fahrenheit	The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(D).
e.	40 CFR Part 63, Subpart HHHHHH (40 CFR 63.11169-11180) [In accordance with 40 CFR 63.11180, this emissions unit is a “miscellaneous surface coating	See c)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	operation" applying coatings containing "target HAPs" and employs "cleaning materials" at an existing "miscellaneous surface coating facility" subject to the control measures specified in this section.]	
f.	40 CFR 63.1-16 (40 CFR 63.11174)	Table 1 to Subpart HHHHHH of Part 63 – Applicability of General Provisions to Subpart HHHHHH of Part 63 shows which parts of the General Provisions in 40 CFR 63.1-16 apply.

(2) Additional Terms and Conditions

a. Coatings applied in the coating operations shall not exceed 1.0 pound VOC per gallon of coating, excluding water and exempt solvents.

b. Cleanup materials applied in the cleanup operations shall not exceed 6.72 pounds VOC per gallon of cleanup material.

c. The maximum annual coating usage for this emissions unit shall not exceed 13,860 gallons, excluding water and exempt solvents, based upon a rolling, 12-month summation of the coating usage figures. The maximum annual cleanup material usage for this emissions unit shall not exceed 365 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage and cleanup material usage upon issuance of this permit.

d. Federally Enforceable Permit to Install and Operate (FEPTIO) P0104357 for this emissions unit takes into account the following voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. The emissions of VOC from this emissions unit shall not exceed 9.9 tons per year.

e. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

c) Operational Restrictions

(1) The permittee shall install, operate, and maintain a dry particulate filter system for the surface coating operations in accordance with the manufacturer=s recommendations,

instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

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

(3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart HHHHHH, including the following sections:

a.	63.11173(e)(1), (f), and (g)(2)	painter training and certification
b.	63.11173(e)(2)(i) and either	
	(e)(2)(ii), (e)(2)(iii), or (e)(2)(iv)	spray booth
c.	63.11173(e)(3)	spray equipment
d.	63.11173(e)(4)	spray equipment cleaning

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

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

b. the mass of VOC per volume of each coating, excluding water and exempt solvents, as applied, calculated as follows:

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

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

where:

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

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

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

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

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

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

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

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

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

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

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific Agallons/year@ and/or Atons/year@ limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

(2) The permittee shall collect and record the following information each month for the coating line.

a. the name and identification number of each coating and cleanup material employed;

b. the mass of VOC per volume of each cleanup material employed, in pounds of VOC per gallon;

c. the volume, in gallons, of each coating employed, excluding water and exempt solvents and the volume, in gallons, of each cleanup material employed;

d. the rolling, 12-month summation of the coating usage, in gallons, and the rolling, 12-month summation of the cleanup material usage, in gallons, for the present month plus the previous 11 months of operation;

e. the total VOC emissions from all the materials employed, in ton(s), i.e., for VOCs from coating usage, the sum of d)(1)b. multiplied by d)(2)c. for each coating applied during the month, divided by 2,000 pounds and for VOCs from cleanup material usage, the sum of d)(2)b. multiplied by d)(2)c. for each cleanup material applied during the month, divided by 2,000 pounds; and

f. the total VOC emissions during the rolling, 12-month period, i.e., the summation of total VOC emissions from coatings and cleanup materials, as recorded in e. above, for the present month plus the previous 11 months of operation, in ton(s).

(3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer=s recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer=s recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer=s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(8) Modeling to demonstrate compliance with, the AToxic Air Contaminant Statute@, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit=s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified FEPTIO 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 to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

(9) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart HHHHHH, including the following sections:

a.	63.11177(a)	painter certification
b.	63.11177(b)	filter efficiency
c.	63.11177(c)	spray gun equivalency
d.	63.11177(d)	copies of notifications and reports submitted
e.	63.11177(g)	records of deviations from requirements

If you are the owner or operator of an affected source, you must maintain copies of the records specified in 63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

e) Reporting Requirements

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

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

a. all deviations (excursions) of the following emission limitations, VOC content 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:

The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 8.16 tons per year (TPY), based on a rolling, 12-month summation, from miscellaneous metals parts coating and cleanup; and

b. all exceedances of the rolling, 12-month coating and/or cleanup material usage limitations.

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).

(3) The permittee shall submit notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart HHHHHH, per the following sections. The owner or operator of an existing source may certify in the Initial Notification that the source is already in compliance and that the Initial

Notification also serves as the Notification of Compliance Status pursuant to requirements in 63.11175(a)(8):

a. 63.11175(a)(1) Initial Notification for an existing source (January 11, 2010)

b. 63.11175(b) Notification of Compliance Status (March 11, 2011)

c. 63.11176(a) Annual Notification of Changes Report

f) Testing Requirements

(1) Compliance with the emission limitations and voluntary restrictions in b) of these terms and conditions shall be determined in accordance with the following method(s) identified below and in B.5. of this permit:

a. Emission Limitations

Coatings applied in the coating operations shall not exceed 1.0 pound VOC per gallon of coating, excluding water and exempt solvents.

Cleanup materials applied in the cleanup operations shall not exceed 6.72 pounds VOC per gallon of cleanup material.

Applicable Compliance Method

OAC rule 3745-21-10(B) shall be used to determine the VOC contents of each coating, thinner, additive, cleanup material, and other material applied. If pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or Method 24A cannot be used, the permittee shall notify the Administrator of USEPA and shall use formulation data for the material to demonstrate compliance until USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

b. Emission Limitation and Usage Restrictions

The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 8.16 tons per year (TPY), based on a rolling, 12-month summation, from miscellaneous metals parts coating and cleanup.

The maximum annual coating usage for this emissions unit shall not exceed 13,860 gallons, based upon a rolling, 12-month summation of the coating usage figures.

The maximum annual cleanup material usage for this emissions unit shall not exceed 365 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.

Applicable Compliance Method

Compliance with the emission limitation and usage restrictions shall be demonstrated by the methods outlined in the recordkeeping requirements in d)(2) above.

The VOC emission limitation was established using information provided by the permittee in PTIO application A0036710 for PTIO P0104357 in the following equations:

13,860 gal coatings – H2O and exempt solvents x 1.0 lbs VOC/gal coatings – H2O and exempt solvents x 1 Ton/2000 lbs = 6.93 TPY VOC.

365 gal cleanup materials/yr x 6.72 lbs VOC/gal cleanup materials x 1 Ton/2000 lbs = 1.23 TPY VOC.

Total 6.93 TPY VOC + 1.23 TPY VOC = 8.16 TPY VOC emission limitation.

c. Control Measures

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

Applicable Compliance Methods

Compliance with the dry particulate filter control measures shall be demonstrated by the methods outlined in the recordkeeping requirements in d)(3) through d)(7) above.

g) Miscellaneous Requirements

(1) None.