



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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

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

MAILING ADDRESS:

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

6/11/2009

Certified Mail

Mr. Greg Flanary
Allied Coating Corporation
387 Fox Drive
Piqua, OH 45356

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0855105001
Permit Number: P0104838
Permit Type: Initial Installation
County: Miami

Dear Permit Holder:

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

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

and Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
RAPCA; Indiana

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

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Allied Coating Corporation

Issue Date: 6/11/2009
Permit Number: P0104838
Permit Type: Initial Installation
Permit Description: Installation of eight metal parts surface coating lines with synthetic minor limits for hazardous air pollutants.
Facility ID: 0855105001
Facility Location: Allied Coating Corporation
387 Fox Dr,
Piqua, OH 45356
Facility Description: Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Stephanie Madden at Regional Air Pollution Control Agency, 117 South Main Street or (937)225-4435. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Allied Coating, 0855105001, currently has five unpermitted emissions units installed and operating: two manually operated dip coating tanks (K001), manual coating spray booth (K002), tumble spray coating machine (K003), spray booth with spindle conveyor (K004), and dip coating tank for gaskets (K005). As part of this permit application, Allied Coating is also proposing to install three additional emissions units: a spray coating booth with spindle conveyor (K006), an automated dip coating machine (K007) and a chain-on-edge coating machine (K008). The eight surface coating lines are used to coat miscellaneous metal parts for the automobile industry.

3. Facility Emissions and Attainment Status:

Allied Coating is located in Miami County which is in attainment for all criteria pollutants except PM2.5. In September 2008 Allied Coating submitted Potential to Emit (PTE) calculations to RAPCA for the five existing emissions units at the facility: K001-K005. The facility wide PTE calculations included VOC, single HAP and combined HAP calculations and were below the Title V permitting thresholds. As part of this permit application Allied Coating is proposing the installation of three new coating operations (K006-K008). The additional coating lines will cause the facility wide PTE for single and combined HAPs to exceed Title V permitting thresholds. Potential emissions are included in Table 1 below. The facility is requesting federally enforceable, facility wide restriction of 10,000 gallons of coating and clean-up material per year to limit the facility HAP PTE to less 9.9 TPY for a single HAP and 24.9 TPY for combined HAPs. Based on the restrictions in this FEPTIO, the maximum combined emissions for K001 through K008 combined will be 7.70 TPY (toluene) single HAP and 17.28 TPY combined HAPs.

4. Source Emissions:

When evaluating the potential emissions for this facility, the worst case scenario was used incorporating the worst case coating, the maximum hourly coating usage rate and an annual operating schedule of 8,760 hours.

Potential emissions are included in Table 1 below:

Table 1: Potential Emissions

Emissions Unit	VOC Emissions TPY	Individual HAP TPY	Combined HAP TPY
K001	5.21	0.87	2.37
K002	15.35	3.74	8.41
K003	15.35	3.74	8.41
K004	3.07	0.75	1.68



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0104838
Facility ID: 0855105001

K005		3.99	0.97	2.19
K006		3.07	0.75	1.68
K007		7.68	1.87	4.20
K008		15.35	3.74	8.41
Clean-up (1000 gallons per year)		3.38	0	0
Total		72.45	16.43	37.35

5. Conclusion:

The terms and conditions in this Federally Enforceable Permit to Install and Operate will limit emissions to the values listed in Table 2. The facility wide maximum coating usage will be limited to 10,000 gallons per year for coatings and clean-up material. Additionally, limiting the HAP emissions to 9.9 TPY of an individual HAP and 24.9 TPY of any combination of HAPs through federally enforceable terms and conditions and record keeping requirements, will prevent Allied Coating from triggering Title V or MACT permitting requirements.

Table 2: Allowable Emissions

Emissions Unit	Max Usage Rate Gallons/year	VOC Emissions TPY	Individual HAP (toluene) TPY	Combined HAPs TPY
K001	9,000	31.55	7.70	17.28
K002				
K003				
K004				
K005				
K006				
K007				
K008				
Clean-up Material	1,000	3.38	0	0
Total	10,000	34.93	7.70	17.28

6. Please provide additional notes or comments as necessary:

The emissions units in this FEPTIO were grouped according to installation dates and coating processes. Emissions units K001 and K005 are dip coating tanks that were installed prior to August 3, 2006 and BAT applies. K007 is also a dip tank, but BAT does not apply because this emissions unit will be installed after August 3, 2006 and the uncontrolled PTE is less than 10 TPY. K002, K003 and K004 are spray coating lines that were installed prior to August 3, 2006 and BAT applies. K006 and K008 are also spray coating lines that will be installed after August 3, 2006 and BAT does not apply because the uncontrolled PTE for each emissions unit is less than 10 TPY.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0104838
Facility ID: 0855105001

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

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>VOC</u>	<u>34.93</u>
<u>Individual HAP</u>	<u>9.9</u>
<u>Combined HAP</u>	<u>24.9</u>



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

DRAFT

**Air Pollution Permit-to-Install and Operate
for
Allied Coating Corporation**

Facility ID: 0855105001
Permit Number: P0104838
Permit Type: Initial Installation
Issued: 6/11/2009
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



Air Pollution Permit-to-Install and Operate
for
Allied Coating Corporation

Contents

Authorization 1

A. Standard Terms and Conditions 3

 1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4

 2. Who is responsible for complying with this permit? 4

 3. What records must I keep under this permit? 4

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

 5. When does my PTIO expire, and when do I need to submit my renewal application? 4

 6. What happens to this permit if my project is delayed or I do not install or modify my source? 5

 7. What reports must I submit under this permit? 5

 8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? 5

 9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5

 10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6

 11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6

 12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6

 13. Can I transfer this permit to a new owner or operator?..... 6

 14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7

 15. What happens if a portion of this permit is determined to be invalid? 7

B. Facility-Wide Terms and Conditions..... 8

C. Emissions Unit Terms and Conditions 10

 1. Emissions Unit Group - Dip Coating Tanks Installed Before August 3, 2006, BAT Applies..... 11

 2. Emissions Unit Group - Dip Coating Tank Installed After August 3, 2006, BAT Does Not Apply Due to PTE < 10 Tons Per Year 22

 3. Emissions Unit Group – Spray Coating Lines Installed after August 3, 2006, BAT Does Not Apply Due to PTE < 10 Tons Per Year 32

 4. Emissions Unit Group – Spray Coating Lines Installed before August 3, 2006 BAT Applies..... 43



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104838

Facility ID: 0855105001

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0855105001

Application Number(s): A0037350

Permit Number: P0104838

Permit Description: Installation of eight metal parts surface coating lines with synthetic minor limits for hazardous air pollutants.

Permit Type: Initial Installation

Permit Fee: \$2,600.00 *DO NOT send payment at this time - subject to change before final issuance*

Issue Date: 6/11/2009

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Allied Coating Corporation
387 Fox Dr
Piqua, OH 45356

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:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

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: P0104838
Permit Description: Installation of eight metal parts surface coating lines with synthetic minor limits for hazardous air pollutants.

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

Group Name: Dip Tanks installed pre 8/3/06

Emissions Unit ID:	K001
Company Equipment ID:	Manual Dip Process
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K005
Company Equipment ID:	Gasket Coating
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Dip tank installed after 8/3/06

Emissions Unit ID:	K007
Company Equipment ID:	Automated Dip Machin
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Spray/ installed after 8/3/06

Emissions Unit ID:	K006
Company Equipment ID:	Spindle Coater
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K008
Company Equipment ID:	COE Machine
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Spray/Installed before 8/3/06

Emissions Unit ID:	K002
Company Equipment ID:	Spray Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Tumble Sprayer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K004
Company Equipment ID:	Seal Machine
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104838

Facility ID: 0855105001

Effective Date: To be entered upon final issuance

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 Regional Air Pollution Control Agency 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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104838

Facility ID: 0855105001

Effective Date: To be entered upon final issuance

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

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

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

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104838

Facility ID: 0855105001

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104838

Facility ID: 0855105001

Effective Date: To be entered upon final issuance

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104838

Facility ID: 0855105001

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group - Dip Coating Tanks Installed Before August 3, 2006, BAT Applies

EU ID	Operations, Property and/or Equipment Description
K001	Two manually operated dip coating tanks
K005	Dip coating tank for gaskets

- 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)(6) through d)(8) and e)(2)e.
 - (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)d., b)(2)b., d)(2), d)(5), e)(2)a., f)(1)d. and f)(1)e.
- 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)	<p><u>For emissions unit K001:</u> Volatile organic compound (VOC) emissions shall not exceed 1.19 pounds per hour from coatings, and 5.63 tons per year, including both coatings and cleanup materials.</p> <p><u>For emissions unit K005:</u> VOC emissions shall not exceed 0.91 pound per hour from coatings, and 4.41 tons per year, including both coatings and cleanup materials.</p> <p>See b)(2)a.</p> <p>The requirements established pursuant to this rule also include the requirements of OAC rules 3745-21-09(U)(2)(e)(i), 3745-17-07(A)(1), and 3745-31-05(D).</p>
b.	OAC rule 3745-21-09(U)(2)(e)(i)	The coating usages shall be less than or



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		equal to 8 gallons of coating material per day for the coating of miscellaneous metal parts.
c.	OAC rule 3745-17-07(A)(1)	See b)(2)c.
d.	OAC rule 3754-31-05(D) (synthetic minor to avoid MACT and Title V)	The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, K003, K004, K005, K006, K007 and K008, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation. See b)(2)b.
e.	OAC rule 3745-114-01 and ORC 3704.03(F)(4)(c)	See d)(6) through d)(8) and e)(2)e.

(2) Additional Terms and Conditions

- a. The hourly emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- b. The permittee has requested federally enforceable restrictions to limit the annual emissions and establish the PTE for this pollutant based on the limitation on the coating and cleanup materials usage. The maximum annual coating and cleanup materials usage for emissions units K001, K002, K003, K004, K005, K006, K007 and K008 combined shall not exceed 10,000 gallons per year, based upon a rolling, 12-month summation of the coating and cleanup materials usage figures. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating and Cleanup Materials Usage
1	833 gallons
2	1,666 gallons
3	2,499 gallons
4	3,332 gallons



5	4,165 gallons
6	4,998 gallons
7	5,831 gallons
8	6,664 gallons
9	7,497 gallons
10	8,330 gallons
11	9,163 gallons
12	10,000 gallons

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

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

c) Operational Restrictions

- (1) The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts for each emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating employed.
 - b. The total number of gallons of all the coatings employed.
- (2) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in this emissions unit:
 - a. the number of gallons of each coating applied or all coatings applied during the month;
 - b. the maximum VOC content for each or the maximum VOC content for any coating applied, in pounds per gallon;
 - c. the total VOC emissions from all coatings applied, i.e., the summation of the products of d)(2)a. times d)(2)b. for each individual coating applied; or the product of the maximum VOC content of any coating applied times the total



gallons of coating employed during the month i.e., d)(2)a. times d)(2)b. for worst case coating;

- d. the name and identification of each cleanup material employed;
- e. the VOC content of each cleanup material, in pounds per gallon;
- f. the number of gallons of each cleanup material employed;
- g. the total VOC emission rate from all cleanup materials, i.e., the summation of the products of d)(2)e. times d)(2)f. for all cleanup materials employed; and
- h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, the sum of d)(2)c. and d)(2)g.

These monthly records shall be maintained for the purpose of determining annual VOC emissions for the emissions unit.

- (3) The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the monthly VOC emission rates from the coating and cleanup materials for the calendar year in d)(2)h.].
- (4) The permittee shall maintain monthly records of the following information:
 - a. The total monthly coating and cleanup usage for each month.
 - b. The rolling, 12-month summation of the coating and cleanup usage.
- (5) 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 units:
 - 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 and the weight fraction of each individual HAP contained in each material applied and identified in d)(5)a. above) [i.e., pound of each individual HAP per pound of each HAP-containing material].
 - c. The number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month.
 - d. The density of each coating, thinner, additive, cleanup material, and other material employed, in pound(s) per gallon.
 - e. For each individual HAP, the total emissions from all the materials employed, in tons [i.e., for each individual HAP, the summation of the products of d)(5)b. times d)(5)c. times d)(5)d. for all the materials applied during the month, divided by 2,000 pounds].
 - f. The total combined HAPs emissions from all the materials employed during the month, in tons [i.e., the summation of all the individual HAPs emissions from d)(5)e. above].



- g. 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 d)(5)e. above], for the present month plus the previous 11 months of operation, in tons.
- h. The total combined HAP emissions during the rolling 12-month period [i.e., the summation of all HAP emissions, as recorded in d)(5)f. above], for the present month plus the previous 11 months of operation, in tons.

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.

- (6) The FEPTIO application for these emissions units, K001, K002, K003, K004, K005, K006, K007 and K008, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The Toxic Air Contaminant Statute, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Review of New Sources of Air Toxic Emissions, Option A, as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., AX hours per day and AY days per week, from that of 8 hours per day and 5 days per week. The resulting



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

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or worst case toxic contaminant(s):

Toxic Contaminant: toluene

TLV (mg/m3): 188.4

Maximum Hourly Emission Rate (lbs/hr): 3.84

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 665.17

MAGLC (ug/m3): 4,476

Toxic Contaminant: xylene

TLV (mg/m3): 434.2

Maximum Hourly Emission Rate (lbs/hr): 1.56

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 270.77

MAGLC (ug/m3): 10,333

Toxic Contaminant: methyl isobutyl ketone (MIBK)

TLV (mg/m3): 204.83

Maximum Hourly Emission Rate (lbs/hr): 2.08

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 361.02

MAGLC (ug/m3): 4,881

Toxic Contaminant: methanol

TLV (mg/m3): 262.09

Maximum Hourly Emission Rate (lbs/hr): 0.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 108.31

MAGLC (ug/m3): 6,262



Toxic Contaminant: ethyl benzene

TLV (mg/m³): 434.20

Maximum Hourly Emission Rate (lbs/hr): 0.52

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 90.26

MAGLC (ug/m³): 10,333

The permittee, has demonstrated that emissions of toluene, xylene, methyl isobutyl ketone, methanol and ethyl benzene, from emissions unit(s) K001, K002, K003, K004, K005, K006, K007 and K008, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the AToxic Air Contaminant Statute, ORC 3704.03(F).

- (7) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the AToxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.



- (8) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute², ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute², ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute², ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute², ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- e) Reporting Requirements
 - (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the maximum annual coating and cleanup materials usage for emissions units K001, K002, K003, K004, K005, K006, K007 and K008 combined; and
 - ii. all exceedances of the rolling, 12-month individual and combined HAP emission limitation for each HAP for all the coatings, thinners, additives, and cleanup materials employed for emissions units K001, K002, K003, K004, K005, K006, K007 and K008 combined.
 - 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);



- d. the magnitude and duration of each deviation (excursion); and
- e. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the AToxic Air Contaminant Statute[@], ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.

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 annual reports that specify the actual coating and cleanup materials usages and the total VOC and HAPs emissions for this emissions unit. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emissions Report.
- (4) 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 b)(1) shall be determined in accordance with the following methods:

a. Emissions Limitation

The coating usages shall be less than or equal to 8 gallons of coating material per day for the coating of miscellaneous metal parts

Applicable Compliance Method

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

b. Emissions Limitation

For K001, 1.19 lbs VOC/hr, 5.63 tons VOC/yr. and for K005, 0.91 lb VOC/hr, 4.41 tons VOC/yr.

Applicable Compliance Method



The hourly allowable VOC emission limitations were established by multiplying the maximum VOC content of all the coatings (lbs VOC/gallon) by the maximum coating application rate (gallons/hr).

Compliance of the tons/yr limitations shall be based upon the record keeping specified in d)(3).

c. Emission Limitation

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

Applicable Compliance Method

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

d. Emission Limitation

The maximum annual coating and cleanup materials usage for emissions units K001, K002, K003, K004, K005, K006, K007 and K008 combined shall not exceed 10,000 gallons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in d)(4)b. of this permit.

e. Emission Limitation

The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, K003, K004, K005, K006, K007 and K008, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in d)(5) of this permit.

- (2) In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104838

Facility ID: 0855105001

Effective Date: To be entered upon final issuance

provides alternative analytical procedures or alternative precision statements for Method 24.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

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

g) Miscellaneous Requirements

- (1) None.



2. Emissions Unit Group - Dip Coating Tank Installed After August 3, 2006, BAT Does Not Apply Due to PTE < 10 Tons Per Year

EU ID	Operations, Property and/or Equipment Description
K007	Automated dip coating machine

- 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)(6) through d)(8) and e)(2)e.
 - (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)d., b)(2)b., d)(2), d)(5), e)(2)a., f)(1)c. and f)(1)d.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)a.
b.	OAC rule 3745-21-09(U)(2)(e)(i)	The coating usages shall be less than or equal to 8 gallons of coating material per day for the coating of miscellaneous metal parts.
c.	OAC rule 3745-17-07(A)(1)	See b)(2)c.
d.	OAC rule 3754-31-05(D) (synthetic minor to avoid MACT and Title V)	The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, K003, K004, K005, K006, K007 and K008, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation. See b)(2)b.
e.	OAC rule 3745-114-01 and ORC	See d)(6) through d)(8) and e)(2)e.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	3704.03(F)(4)(c)	

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/year.
- b. The permittee has requested federally enforceable restrictions to limit the annual emissions and establish the PTE for this pollutant based on the limitation on the coating and cleanup materials usage. The maximum annual coating and cleanup materials usage for emissions units K001, K002, K003, K004, K005, K006, K007 and K008 combined shall not exceed 10,000 gallons per year, based upon a rolling, 12-month summation of the coating and cleanup materials usage figures. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating and Cleanup Materials Usage
1	833 gallons
2	1,666 gallons
3	2,499 gallons
4	3,332 gallons
5	4,165 gallons
6	4,998 gallons
7	5,831 gallons
8	6,664 gallons
9	7,497 gallons
10	8,330 gallons
11	9,163 gallons
12	10,000 gallons

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



- c. Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six - minute average, except as specified by rule.
- c) Operational Restrictions
 - (1) The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts for each emissions unit.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating employed.
 - b. The total number of gallons of all the coatings employed.
 - (2) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in this emissions unit:
 - a. the number of gallons of each coating applied or all coatings applied during the month;
 - b. the maximum VOC content for each or the maximum VOC content for any coating applied, in pounds per gallon;
 - c. the total VOC emissions from all coatings applied, i.e., the summation of the products of d)(2)a. times d)(2)b. for each individual coating applied; or the product of the maximum VOC content of any coating applied times the total gallons of coating employed during the month i.e., d)(2)a. times d)(2)b. for worst case coating;
 - d. the name and identification of each cleanup material employed;
 - e. the VOC content of each cleanup material, in pounds per gallon;
 - f. the number of gallons of each cleanup material employed;
 - g. the total VOC emission rate from all cleanup materials, i.e., the summation of the products of d)(2)e. times d)(2)f. for all cleanup materials employed; and
 - h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, the sum of d)(2)c. and d)(2)g.

These monthly records shall be maintained for the purpose of determining annual VOC emissions for the emissions unit.

 - (3) The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the monthly VOC emission rates from the coating and cleanup materials for the calendar year in d)(2)h.].
 - (4) The permittee shall maintain monthly records of the following information:



- a. The total monthly coating and cleanup usage for each month.
 - b. The rolling, 12-month summation of the coating and cleanup usage.
- (5) 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 units:
- 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 and the weight fraction of each individual HAP contained in each material applied and identified in d)(5)a. above) [i.e., pound of each individual HAP per pound of each HAP-containing material].
 - c. The number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month.
 - d. The density of each coating, thinner, additive, cleanup material, and other material employed, in pound(s) per gallon.
 - e. For each individual HAP, the total emissions from all the materials employed, in tons [i.e., for each individual HAP, the summation of the products of d)(5)b. times d)(5)c. times d)(5)d. for all the materials applied during the month, divided by 2,000 pounds].
 - f. The total combined HAPs emissions from all the materials employed during the month, in tons [i.e., the summation of all the individual HAPs emissions from d)(5)e. above].
 - g. 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 d)(5)e. above], for the present month plus the previous 11 months of operation, in tons.
 - h. The total combined HAP emissions during the rolling 12-month period [i.e., the summation of all HAP emissions, as recorded in d)(5)f. above], for the present month plus the previous 11 months of operation, in tons.

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.

- (6) The FEPTIO application for these emissions units, K001, K002, K003, K004, K005, K006, K007 and K008, was evaluated based on the actual materials and the design parameters of the emissions unit's(s) exhaust system, as specified by the permittee. The A Toxic Air Contaminant Statute, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion



model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: toluene

TLV (mg/m3): 188.4

Maximum Hourly Emission Rate (lbs/hr): 3.84

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 665.17

MAGLC (ug/m3): 4,476

Toxic Contaminant: xylene

TLV (mg/m3): 434.2



Maximum Hourly Emission Rate (lbs/hr): 1.56

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TLV (mg/m3): 262.09

Maximum Hourly Emission Rate (lbs/hr): 0.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 108.31

MAGLC (ug/m3): 6,262

Toxic Contaminant: ethyl benzene

TLV (mg/m3): 434.20

Maximum Hourly Emission Rate (lbs/hr): 0.52

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 90.26

MAGLC (ug/m3): 10,333

The permittee, has demonstrated that emissions of toluene, xylene, methyl isobutyl ketone, methanol and ethyl benzene, from emissions unit(s) K001, K002, K003, K004, K005, K006, K007 and K008, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the A Toxic Air Contaminant Statute, ORC 3704.03(F).

- (7) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can



affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the AToxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (8) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.



e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

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

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

i. all exceedances of the maximum annual coating and cleanup materials usage for emissions units K001, K002, K003, K004, K005, K006, K007 and K008 combined; and

ii. all exceedances of the rolling, 12-month individual and combined HAP emission limitation for each HAP for all the coatings, thinners, additives, and cleanup materials employed for emissions units K001, K002, K003, K004, K005, K006, K007 and K008 combined.

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);

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

e. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the ^AToxic Air Contaminant Statute[@], ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.

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 annual reports that specify the actual coating and cleanup materials usages and the total VOC and HAPs emissions for this emissions unit. These reports shall be submitted by April 15 of each year. This reporting requirement may be



satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emissions Report.

- (4) 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 b)(1) shall be determined in accordance with the following methods:

- a. Emissions Limitation

The coating usages shall be less than or equal to 8 gallons of coating material per day for the coating of miscellaneous metal parts

Applicable Compliance Method

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

- b. Emission Limitation

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

Applicable Compliance Method

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

- c. Emission Limitation

The maximum annual coating and cleanup materials usage for emissions units K001, K002, K003, K004, K005, K006, K007 and K008 combined shall not exceed 10,000 gallons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in d)(4)b. of this permit.

- d. Emission Limitation

The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, K003, K004, K005, K006, K007 and K008, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single



HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in d)(5) of this permit.

- (2) (In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

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

g) Miscellaneous Requirements

- (1) None.



3. Emissions Unit Group – Spray Coating Lines Installed after August 3, 2006, BAT Does Not Apply Due to PTE < 10 Tons Per Year

EU ID	Operations, Property and/or Equipment Description
K006	Spray coating operation with spindle conveyor
K008	Chain on edge coating machine

- 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)(11) through d)(13) and e)(2)e.
 - (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)d., b)(2)b., d)(2), d)(5), e)(2)a., f)(1)c. and f)(1)d.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)a.
b.	OAC rule 3745-21-09(U)(2)(e)(i)	The coating usages shall be less than or equal to 8 gallons of coating material per day for the coating of miscellaneous metal parts.
c.	OAC rule 3745-17-07(A)(1)	See b)(2)c.
	OAC rule 3745-17-11(C)	See b)(2)d and b)(2)e.
d.	OAC rule 3754-31-05(D) (synthetic minor to avoid MACT and Title V)	The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, K003, K004, K005, K006, K007 and K008, deminimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)b.
e.	OAC rule 3745-114-01 and ORC 3704.03(F)(4)(c)	See d)(11) through d)(13) and e)(2)e.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/year.
- b. The permittee has requested federally enforceable restrictions to limit the annual emissions and establish the PTE for this pollutant based on the limitation on the coating and cleanup materials usage. The maximum annual coating and cleanup materials usage for emissions units K001, K002, K003, K004, K005, K006, K007 and K008 combined shall not exceed 10,000 gallons per year, based upon a rolling, 12-month summation of the coating and cleanup materials usage figures. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating and Cleanup Materials Usage
1	833 gallons
2	1,666 gallons
3	2,499 gallons
4	3,332 gallons
5	4,165 gallons
6	4,998 gallons
7	5,831 gallons
8	6,664 gallons
9	7,497 gallons
10	8,330 gallons
11	9,163 gallons
12	10,000 gallons

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating and



cleanup materials usage limitation shall be based upon a rolling, 12-month summation of the coating and cleanup materials usage figures.

- c. Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six - minute average, except as specified by rule.
- d. The permittee shall operate the dry particulate filter system whenever emissions units K006 or K008 are in operation.
- 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 not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts for each emissions unit.
- (2) 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.
- (3) 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.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating employed.
 - b. The total number of gallons of all the coatings employed.
- (2) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in this emissions unit:
 - a. the number of gallons of each coating applied or all coatings applied during the month;
 - b. the maximum VOC content for each or the maximum VOC content for any coating applied, in pounds per gallon;
 - c. the total VOC emissions from all coatings applied, i.e., the summation of the products of d)(2)a. times d)(2)b. for each individual coating applied; or the



product of the maximum VOC content of any coating applied times the total gallons of coating employed during the month i.e., d)(2)a. times d)(2)b. for worst case coating;

- d. the name and identification of each cleanup material employed;
- e. the VOC content of each cleanup material, in pounds per gallon;
- f. the number of gallons of each cleanup material employed;
- g. the total VOC emission rate from all cleanup materials, i.e., the summation of the products of d)(2)e. times d)(2)f. for all cleanup materials employed; and
- h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, the sum of d)(2)c. and d)(2)g.

These monthly records shall be maintained for the purpose of determining annual VOC emissions for the emissions unit.

- (3) The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the monthly VOC emission rates from the coating and cleanup materials for the calendar year in d)(2)h.].
- (4) The permittee shall maintain monthly records of the following information:
 - a. The total monthly coating and cleanup usage for each month.
 - b. The rolling, 12-month summation of the coating and cleanup usage.
- (5) 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 units:
 - 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 and the weight fraction of each individual HAP contained in each material applied and identified in d)(5)a. above) [i.e., pound of each individual HAP per pound of each HAP-containing material].
 - c. The number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month.
 - d. The density of each coating, thinner, additive, cleanup material, and other material employed, in pound(s) per gallon.
 - e. For each individual HAP, the total emissions from all the materials employed, in tons [i.e., for each individual HAP, the summation of the products of d)(5)b. times d)(5)c. times d)(5)d. for all the materials applied during the month, divided by 2,000 pounds].



- f. The total combined HAPs emissions from all the materials employed during the month, in tons [i.e., the summation of all the individual HAPs emissions from d)(5)e. above].
- g. 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 d)(5)e. above], for the present month plus the previous 11 months of operation, in tons.
- h. The total combined HAP emissions during the rolling 12-month period [i.e., the summation of all HAP emissions, as recorded in d)(5)f. above], for the present month plus the previous 11 months of operation, in tons.

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.

- (6) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (7) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (8) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (9) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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



- (10) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer=s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (11) The FEPTIO application for these emissions units, K001, K002, K003, K004, K005, K006, K007 and K008, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The Δ Toxic Air Contaminant Statute Δ , ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Δ Review of New Sources of Air Toxic Emissions, Option A Δ , as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) Δ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices Δ ; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) Δ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices Δ ; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., Δ X Δ hours per day and Δ Y Δ days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$



- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or ~~the worst case~~ toxic contaminant(s):

Toxic Contaminant: toluene

TLV (mg/m³): 188.4

Maximum Hourly Emission Rate (lbs/hr): 3.84

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 665.17

MAGLC (ug/m³): 4,476

Toxic Contaminant: xylene

TLV (mg/m³): 434.2

Maximum Hourly Emission Rate (lbs/hr): 1.56

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 270.77

MAGLC (ug/m³): 10,333

Toxic Contaminant: methyl isobutyl ketone (MIBK)

TLV (mg/m³): 204.83

Maximum Hourly Emission Rate (lbs/hr): 2.08

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 361.02

MAGLC (ug/m³): 4,881

Toxic Contaminant: methanol

TLV (mg/m³): 262.09

Maximum Hourly Emission Rate (lbs/hr): 0.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 108.31

MAGLC (ug/m³): 6,262

Toxic Contaminant: ethyl benzene



TLV (mg/m3): 434.20

Maximum Hourly Emission Rate (lbs/hr): 0.52

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 90.26

MAGLC (ug/m3): 10,333

The permittee, has demonstrated that emissions of toluene, xylene, methyl isobutyl ketone, methanol and ethyl benzene, from emissions unit(s) K001, K002, K003, K004, K005, K006, K007 and K008, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the AToxic Air Contaminant Statute, ORC 3704.03(F).

- (12) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the AToxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (13) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s)



modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

- b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute, ORC 3704.03(F);
- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
- d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the maximum annual coating and cleanup materials usage for emissions units K001, K002, K003, K004, K005, K006, K007 and K008 combined; and
 - ii. all exceedances of the rolling, 12-month individual and combined HAP emission limitation for each HAP for all the coatings, thinners, additives, and cleanup materials employed for emissions units K001, K002, K003, K004, K005, K006, K007 and K008 combined.
 - 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);
 - d. the magnitude and duration of each deviation (excursion); and
 - e. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the AToxic Air Contaminant Statute,



ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.

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 annual reports that specify the actual coating and cleanup materials usages and the total VOC and HAPs emissions for this emissions unit. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emissions Report.
- (4) 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 b)(1) shall be determined in accordance with the following methods:
 - a. Emissions Limitation

The coating usages shall be less than or equal to 8 gallons of coating material per day for the coating of miscellaneous metal parts

Applicable Compliance Method

Compliance shall be based upon the record keeping specified in d)(1).
 - b. Emission Limitation

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

Applicable Compliance Method

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



The maximum annual coating and cleanup materials usage for emissions units K001, K002, K003, K004, K005, K006, K007 and K008 combined shall not exceed 10,000 gallons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in d)(4)b. of this permit.

d. **Emission Limitation**

The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, K003, K004, K005, K006, K007 and K008, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in d)(5) of this permit.

- (2) (In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

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

g) **Miscellaneous Requirements**

- (1) None.



4. Emissions Unit Group – Spray Coating Lines Installed before August 3, 2006 BAT Applies

EU ID	Operations, Property and/or Equipment Description
K002	Manual coating spray booth
K003	Tumble spray coating machine
K004	Spray booth with spindle conveyor

- 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)(11) through d)(13) and e)(2)e.
- (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)e., b)(2)b., d)(2), d)(5), e)(2)a., f)(1)d. and f)(1)e.
- 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)	<p><u>For emissions units K002 and K003, individually:</u> VOC emissions shall not exceed 3.51 pounds per hour from coatings, and 15.80 tons per year, including both coatings and cleanup materials.</p> <p><u>For emissions unit K004:</u> VOC emissions shall not exceed 0.7 pound per hour from coatings, and 3.49 tons per year, including both coatings and cleanup materials.</p> <p>See b)(2)a.</p> <p>The requirements established pursuant to this rule also include the requirements of OAC rules 3745-21-09(U)(2)(e)(i), 3745-</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		17-07(A)(1), 3745-17-11(C), and 3745-31-05(D).
b.	OAC rule 3745-21-09(U)(2)(e)(i)	The coating usages shall be less than or equal to 8 gallons of coating material per day for the coating of miscellaneous metal parts.
c.	OAC rule 3745-17-07(A)(1)	See b)(2)c.
d.	OAC rule 3745-17-11(C)	See b)(2)d. and b)(2)e.
e.	OAC rule 3754-31-05(D) (synthetic minor to avoid MACT and Title V)	The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, K003, K004, K005, K006, K007 and K008, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation. See b)(2)b.
f.	OAC rule 3745-114-01 and ORC 3704.03(F)(4)(c)	See d)(11) through d)(13) and e)(2)e.

(2) Additional Terms and Conditions

- a. The hourly emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- b. The permittee has requested federally enforceable restrictions to limit the annual emissions and establish the PTE for this pollutant based on the limitation on the coating and cleanup materials usage. The maximum annual coating and cleanup materials usage for emissions units K001, K002, K003, K004, K005, K006, K007 and K008 combined shall not exceed 10,000 gallons per year, based upon a rolling, 12-month summation of the coating and cleanup materials usage figures. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating and Cleanup Materials Usage
1	833 gallons
2	1,666 gallons



3	2,499 gallons
4	3,332 gallons
5	4,165 gallons
6	4,998 gallons
7	5,831 gallons
8	6,664 gallons
9	7,497 gallons
10	8,330 gallons
11	9,163 gallons
12	10,000 gallons

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

- c. Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six - minute average, except as specified by rule.
- d. The permittee shall operate the dry particulate filter system whenever emissions units K002, K003 or K004 are in operation.
- 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 not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts for each emissions unit.
- (2) The permittee shall operate and maintain the 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.



- (3) 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.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating employed.
 - b. The total number of gallons of all the coatings employed.
- (2) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in this emissions unit:
 - a. the number of gallons of each coating applied or all coatings applied during the month;
 - b. the maximum VOC content for each or the maximum VOC content for any coating applied, in pounds per gallon;
 - c. the total VOC emissions from all coatings applied, i.e., the summation of the products of d)(2)a. times d)(2)b. for each individual coating applied; or the product of the maximum VOC content of any coating applied times the total gallons of coating employed during the month i.e., d)(2)a. times d)(2)b. for worst case coating;
 - d. the name and identification of each cleanup material employed;
 - e. the VOC content of each cleanup material, in pounds per gallon;
 - f. the number of gallons of each cleanup material employed;
 - g. the total VOC emission rate from all cleanup materials, i.e., the summation of the products of d)(2)e. times d)(2)f. for all cleanup materials employed; and
 - h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, the sum of d)(2)c. and d)(2)g.

These monthly records shall be maintained for the purpose of determining annual VOC emissions for the emissions unit.

- (3) The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the monthly VOC emission rates from the coating and cleanup materials for the calendar year in d)(2)h.].
- (4) The permittee shall maintain monthly records of the following information:
 - a. The total monthly coating and cleanup usage for each month.
 - b. The rolling, 12-month summation of the coating and cleanup usage.



- (5) 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 units:
- 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 and the weight fraction of each individual HAP contained in each material applied and identified in d)(5)a. above) [i.e., pound of each individual HAP per pound of each HAP-containing material].
 - c. The number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month.
 - d. The density of each coating, thinner, additive, cleanup material, and other material employed, in pound(s) per gallon.
 - e. For each individual HAP, the total emissions from all the materials employed, in tons [i.e., for each individual HAP, the summation of the products of d)(5)b. times d)(5)c. times d)(5)d. for all the materials applied during the month, divided by 2,000 pounds].
 - f. The total combined HAPs emissions from all the materials employed during the month, in tons [i.e., the summation of all the individual HAPs emissions from d)(5)e. above].
 - g. 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 d)(5)e. above], for the present month plus the previous 11 months of operation, in tons.
 - h. The total combined HAP emissions during the rolling 12-month period [i.e., the summation of all HAP emissions, as recorded in d)(5)f. above], for the present month plus the previous 11 months of operation, in tons.
- 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.
- (6) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (7) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.



- (8) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations
- (9) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

- (10) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (11) The FEPTIO application for these emissions units, K001, K002, K003, K004, K005, K006, K007 and K008, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The ΔToxic Air Contaminant Statute^Δ, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled ΔReview of New Sources of Air Toxic Emissions, Option A^Δ, as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) ΔThreshold Limit Values for



Chemical Substances and Physical Agents Biological Exposure Indices;
or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., X hours per day and Y days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or worst case toxic contaminant(s):

Toxic Contaminant: toluene

TLV (mg/m3): 188.4

Maximum Hourly Emission Rate (lbs/hr): 3.84

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 665.17

MAGLC (ug/m3): 4,476

Toxic Contaminant: xylene

TLV (mg/m3): 434.2

Maximum Hourly Emission Rate (lbs/hr): 1.56

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 270.77

MAGLC (ug/m3): 10,333

Toxic Contaminant: methyl isobutyl ketone (MIBK)

TLV (mg/m3): 204.83

Maximum Hourly Emission Rate (lbs/hr): 2.08



Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 361.02

MAGLC (ug/m3): 4,881

Toxic Contaminant: methanol

TLV (mg/m3): 262.09

Maximum Hourly Emission Rate (lbs/hr): 0.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 108.31

MAGLC (ug/m3): 6,262

Toxic Contaminant: ethyl benzene

TLV (mg/m3): 434.20

Maximum Hourly Emission Rate (lbs/hr): 0.52

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 90.26

MAGLC (ug/m3): 10,333

The permittee, has demonstrated that emissions of toluene, xylene, methyl isobutyl ketone, methanol and ethyl benzene, from emissions unit(s) K001, K002, K003, K004, K005, K006, K007 and K008, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

- (12) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and



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

If the permittee determines that the AToxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (13) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F):

- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
- b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute, ORC 3704.03(F);
- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
- d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:



- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the maximum annual coating and cleanup materials usage for emissions units K001, K002, K003, K004, K005, K006, K007 and K008 combined; and
 - ii. all exceedances of the rolling, 12-month individual and combined HAP emission limitation for each HAP for all the coatings, thinners, additives, and cleanup materials employed for emissions units K001, K002, K003, K004, K005, K006, K007 and K008 combined.
- 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);
- d. the magnitude and duration of each deviation (excursion); and
- e. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the A Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.

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 annual reports that specify the actual coating and cleanup materials usages and the total VOC and HAPs emissions for this emissions unit. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emissions Report.
- (4) 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 b)(1) shall be determined in accordance with the following methods:

a. Emissions Limitation

The coating usages shall be less than or equal to 8 gallons of coating material per day for the coating of miscellaneous metal parts

Applicable Compliance Method

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

b. Emissions Limitation

For K002 and K003 (individually), 3.51 lbs VOC/hr, 15.80 tons VOC/yr; for K004, 0.7 lb VOC/hr, 3.49 tons VOC/yr.

Applicable Compliance Method

The hourly allowable VOC emission limitations were established by multiplying the maximum VOC content of all the coatings (lbs VOC/gallon) by the maximum coating application rate (gallons/hr).

Compliance of the tons/yr limitations shall be based upon the record keeping specified in d)(3).

c. Emission Limitation

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

Applicable Compliance Method

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

d. Emission Limitation

The maximum annual coating and cleanup materials usage for emissions units K001, K002, K003, K004, K005, K006, K007 and K008 combined shall not exceed 10,000 gallons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in d)(4)b. of this permit.



e. Emission Limitation

The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, K003, K004, K005, K006, K007 and K008, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in d)(5) of this permit.

- (2) In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

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

g) Miscellaneous Requirements

- (1) None.