State of Ohio Environmental Protection Agency

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Certified Mail

6/30/2009

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No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Bruce Stevens
Johnson Controls Inc. Automotive Experience
918 South Union St
Bryan, OH 43506-0568

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0386010201
Permit Number: P0087835
Permit Type: OAC Chapter 3745-31 Modification
County: Williams

Dear Permit Holder:

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

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

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

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

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

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-NWDO

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

Air Pollution Permit-to-Install and Operate
for
Johnson Controls Inc. Automotive Experience

Facility ID:	0386010201
Permit Number:	P0087835
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	6/30/2009
Effective:	6/30/2009
Expiration:	6/30/2014

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
Johnson Controls Inc. Automotive Experience

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Authorization

Facility ID: 0386010201
Application Number(s): A0018911, A0037117
Permit Number: P0087835
Permit Description: The purpose of this permit is to establish federally enforceable restrictions on VOC emissions from this facility to below major source thresholds. This permit is being processed to limit OC emissions to below Title V levels. This facility was issued a synthetic minor permit for HAP's on 04/12/07 to opt out of MACT PPPP requirements by avoiding major source thresholds. After doing so, the facility still remained major for OC's, thus the reason for this permit. The facility is currently operating under an expired Title V permit (06/20/06) and will continue to until issuance of this FEPTIO.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $200.00
Issue Date: 6/30/2009
Effective Date: 6/30/2009
Expiration Date: 6/30/2014
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15
This document constitutes issuance to:

Johnson Controls Inc. Automotive Experience
918 South Union St
Bryan, OH 43506-0568

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0087835
Permit Description: The purpose of this permit is to establish federally enforceable restrictions on VOC emissions from this facility to below major source thresholds. This permit is being processed to limit OC emissions to below Title V levels. This facility was issued a synthetic minor permit for HAP's on 04/12/07 to opt out of MACT PPPP requirements by avoiding major source thresholds. After doing so, the facility still remained major for OC's, thus the reason for this permit. The facility is currently operating under an expired Title V permit (06/20/06) and will continue to until issuance of this FEPTIO.

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

Emissions Unit ID:	**P002**
Company Equipment ID:	Assembly
Superseded Permit Number:	03-17277
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P801**
Company Equipment ID:	Facility wide cleanup
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R029**
Company Equipment ID:	Paint booth #29
Superseded Permit Number:	03-17277
General Permit Category and Type:	Not Applicable

Group Name: Painting Operations

Emissions Unit ID:	**R006**
Company Equipment ID:	Paint booth #6
Superseded Permit Number:	03-17277
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R012**
Company Equipment ID:	Paint booth #12
Superseded Permit Number:	03-17277
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R013**
Company Equipment ID:	Paint booth #13
Superseded Permit Number:	03-17277
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R014**
Company Equipment ID:	Paint booth #14
Superseded Permit Number:	03-17277
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R015**
Company Equipment ID:	Paint booth #15
Superseded Permit Number:	03-17277
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R016**
Company Equipment ID:	Paint booth #16
Superseded Permit Number:	03-17277
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R017**

Company Equipment ID:	Paint booth #17
Superseded Permit Number:	03-17277
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R018**
Company Equipment ID:	Paint booth #18
Superseded Permit Number:	03-17277
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R019**
Company Equipment ID:	Paint booth #19
Superseded Permit Number:	03-17277
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R027**
Company Equipment ID:	Paint booth #27
Superseded Permit Number:	03-17277
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. P002, Assembly

Operations, Property and/or Equipment Description:

Assembly (gluing station)

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. None.

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R019, R027, and R029, combined [See b)(2)a.i.] 80 tons Volatile Organic Compounds (VOC)/rolling, 12-month period, from emissions units P002, P801, R006, R012 through R019, R027,and R029, combined [See b)(2)a.ii. and c)(1)]
b.	OAC rule 3745-21-07(G)	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)c.
d.	OAC rule 3745-17-11(C)	See b)(2)d., c)(2) and c)(3)
e.	OAC rule 3745-17-07(A)	See b)(2)e.

(2) Additional Terms and Conditions

a. The permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R019, R027, and R029, combined.

Federally enforceable limitations of 9.0 tons of any individual HAP and 24.0 tons of any combination of HAP's per rolling, 12-month period were initially established in a permit issued on April 12, 2007 and as such the facility has existing records of HAP emissions in lieu of establishing monthly HAP emissions restrictions for the first year of operation.

ii. 80 tons VOCs/rolling, 12-month period, from emissions units P002, P801, R006, R012 through R019, R027, and R029, combined [See c)(1)].

b. OAC Rule 3745-21-07(G)(2) does not apply to this emissions unit because the facility is not located in a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06, and is not a "new source."

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

c. The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Williams County.

d. 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.

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

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

c) Operational Restrictions

(1) The maximum rolling, 12-month quantity of VOC-containing materials employed in emissions units P002, P801, R006, R012 through R019, R027, and R029, combined, is limited by the following equation:

sum[M=1,12] {sum[i=1,n](Vi Gi) ÷ 2000 lbs/ton} <= 80.0

where,

M = the increment of the rolling 12-month period;
V_i = VOC content in pounds per gallon of each material employed
G_i = Gallons used of each VOC containing material for the rolling 12-month period
n = total number of unique VOC containing materials employed in emissions units P002, P801, R006, R012 through R019, R027, and R029.

To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of VOC (Tons)
1	20.0
1-2	25.5
1-3	30.9
1-4	36.4
1-5	41.9
1-6	47.3
1-7	52.8
1-8	58.2
1-9	63.7
1-10	69.0
1-11	74.6
1-12	80.0

After the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emission rates.

(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 month for all materials containing any hazardous air pollutant (HAP) that are applied in emissions units P002, P801, R006, R012 through R019, R027, and R029, combined:

a. the name and identification number/code of each HAP-containing material;

b. the name/identification of each individual HAP contained in each material applied [and identified in d)(1)a. above] and the pound(s) of each HAP per gallon of each HAP-containing material applied;

c. the number of gallons of each HAP-containing material applied during the month;

d. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of d)(1)b. times d)(1)c. for all the materials applied during the month, divided by 2,000 pounds;

e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from d)(1)d. above;

f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in d)(1)d. above, for the present month plus the previous 11 months of operation, in ton(s); and

g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in d)(1)e. above, for the present month plus the previous 11 months of operation, in ton(s).

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.

(2) The permittee shall collect and record the following information each month for all materials containing any VOCS that are applied in emissions units P002, P801, R006, R012 through R019, R027, and R029, combined:

a. the company name or identification for each VOC-containing material employed;

b. the volume, in gallons, of each VOC-containing material employed;

c. the VOC content of each VOC containing material employed, in pounds per gallon, as applied;

d. the VOC emission rate, in pounds, for each VOC-containing material employed [d)(2)b. times d)(2)c.];

e. the total VOC emission rate from all VOC-containing materials employed [summation of d)(2)d.], in pounds or tons;

f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total VOC emissions, in tons; and

g. beginning the first month, after the first 12 months of operation under the provisions of this permit, the rolling, 12-month VOC emission rates, in tons.

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

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

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

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

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

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

(7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(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.

e) Reporting Requirements

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

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

i. 9.00 tons per rolling, 12-month period for any individual HAP for emissions units P002, P801, R006, R012 through R019, R027, and R029, combined;

ii. 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R019, R027, and R029, combined; and

iii. 80 tons VOC/rolling, 12-month period from emissions units P002, P801, R006, R012 through R019, R027, and R029, combined, and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels;

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

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

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

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

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

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

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. <u>Emission Limitation</u>

9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R019, R027, and R029, combined.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in Section d)(1) of this permit.

b. Emission Limitation

80 tons VOC/rolling, 12-month period from emissions units P002, P801, R006, R012 through R019, R027, and R029, combined.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements in sections d)(2) of this permit.

g) Miscellaneous Requirements

(1) None.

2. P801, Facility wide cleanup

Operations, Property and/or Equipment Description:

Facility wide cleanup

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. g)(1)

(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)b., b)(2)b., c)(2), d)(2), d)(3), d)(4), e)(1) and f)(1)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)a.
b.	OAC rule 3745-31-05(D)	9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R019, R027, and R029, combined [See b)(2)b.i.] 80 tons Volatile Organic Compounds (VOCs)/rolling, 12-month period from emissions units P002, P801, R006, R012 through R019, R027, and R029 combined [See b)(2)b.ii. and c)(2)]
c.	OAC rule 3745-21-07(G)(2)	See b)(2)c and c)(1).

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the organic compound and volatile organic compound

emissions from this air contaminant source since the potential to emit for this pollutant is less than 10 tons/year.

The potential to emit for OC from this emissions unit is 8.32 tons per year and was determined by adding the potential emissions from the three cleanup materials employed.

A maximum cleanup material usage rate of 70 gallons/month, by an OC content of 6.59 lbs/gal (Acetone), by a maximum operating schedule of 12 months/yr and dividing by 2000 lbs/ton (2.77 TPY);

A maximum cleanup material usage rate of 70 gallons/month, by an OC content of 6.67 lbs/gal (GW 100 solvent), by a maximum operating schedule of 12 months/yr and dividing by 2000 lbs/ton (2.80 TPY);

A maximum cleanup material usage rate of 70 gallons/month, by an OC content of 6.55 lbs/gal (Isopropyl Alcohol), by a maximum operating schedule of 12 months/yr and dividing by 2000 lbs/ton (2.75 TPY).

The potential to emit for VOC from this emissions unit is 4.15 tons per year and was determined by adding the potential emissions from the two VOC containing cleanup materials employed.

A maximum cleanup material usage rate of 70 gallons/month, by an VOC content of 3.34 lbs/gal (GW 100 solvent consists of approximately 50% VOC materials taken from company supplied data), by a maximum operating schedule of 12 months/yr and dividing by 2000 lbs/ton (1.40 TPY);

A maximum cleanup material usage rate of 70 gallons/month, by an VOC content of 6.55 lbs/gal (Isopropyl Alcohol), by a maximum operating schedule of 12 months/yr and dividing by 2000 lbs/ton (2.75 TPY).

b. The permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined.

Federally enforceable limitations of 9.0 tons of any individual HAP and 24.0 tons of any combination of HAP's per rolling, 12-month period were initially established in a permit issued on April 12, 2007 and as such the facility has existing records of HAP emissions in lieu of establishing monthly HAP emissions restrictions for the first year of operation.

ii. 80 tons Volatile Organic Compound (VOC)/rolling, 12-month period from emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined [See c)(2)].

c. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio=s State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The requirements of amended OAC rule 3745-21-07 do not apply to emissions units that are installed after February 18, 2008. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

Term b)(1)c., c)(1), d)(1) and e)(1).

c) Operational Restrictions

(1) The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material as defined in OAC rule 3745-21-01.

(2) The maximum rolling, 12-month quantity of VOC containing materials employed in emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined, is limited by the following equation:

sum[M=1,12] {sum[i=1,n](Vi Gi) ÷ 2000 lbs/ton} <= 80.0

where,

M = the increment of the rolling 12-month period;
V_i = VOC content in pounds per gallon of each material employed
G_i = Gallons used of each VOC containing material for the rolling 12-month period
n = total number of unique VOC containing materials employed in emissions units P002, P801, R006, R012 through R019, R027, and R029.

To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of VOC (Tons)
1	20.0
1-2	25.5
1-3	30.9
1-4	36.4
1-5	41.9
1-6	47.3
1-7	52.8
1-8	58.2
1-9	63.7
1-10	69.0
1-11	74.6
1-12	80.0

After the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

d) Monitoring and/or Recordkeeping Requirements

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

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

b. documentation on whether or not each cleanup material employed is a photochemically reactive material.

(2) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP) that are applied in emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined:

a. the name and identification number/code of each HAP-containing material;

b. the name/identification of each individual HAP contained in each material applied [and identified in d)(2)a. above] and the pound(s) of each HAP per gallon of each HAP-containing material applied;

c. the number of gallons of each HAP-containing material applied during the month;

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

e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from d)(2)d. above;

f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in d)(2)d. above, for the present month plus the previous 11 months of operation, in ton(s); and

g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in d)(2)e. above, for the present month plus the previous 11 months of operation, in ton(s).

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.

(3) The permittee shall collect and record the following information each month for all materials containing any VOC that are applied in emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined:

a. the company name or identification for each VOC-containing material employed;

b. the volume, in gallons, of each VOC containing material employed;

c. the VOC content of each VOC containing material employed, in pounds per gallon, as applied;

d. the VOC emission rate, in pounds, for each VOC-containing material employed [d)(3)b. times d)(3)c.];

e. the total VOC emission rate from all VOC-containing materials employed [summation of d)(3)d.], in pounds or tons;

f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total VOC emissions, in tons; and

g. beginning the first month, after the first 12 months of operation under the provisions of this permit, the rolling, 12-month VOC emission rates, in tons.

(4) If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered materials, and the recovery drum or tank serving this emissions unit:

a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;

b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;

c. a record of the VOC content of each material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;

d. the mass (lbs) of VOC to be credited to the rolling, 12-month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped [i.e., d)(4)b. times d)(4)c.], and the date of each such shipment or record of credit; and

e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits [d)(4)d.], for each shipment recorded during the rolling 12 month period.

f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.

e) Reporting Requirements

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

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

i. 9.00 tons per rolling, 12-month period for any individual HAP for emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined;

ii. 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined; and

iii. 80 tons Volatile Organic Compound (VOC)/rolling, 12-month period from emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels;

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

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

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

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

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

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

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. <u>Emission Limitations</u>

9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in Section d)(2) of this permit.

b. Emission Limitation

80 tons VOC/rolling, 12-month period from emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements in sections d)(3) and d)(4) of this permit.

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the AToxic Air Contaminant Statute@, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit=s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified federally enforceable permit-to-install and operate prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new federally enforceable permit-to-install and operate.

3. R029, Paint booth #29

Operations, Property and/or Equipment Description:

Paint spray booth 29 -plastic molded products (with drying oven)

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

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

a. b)(1)g., d)(6), d)(7), and d)(8)

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

a. b)(1)b., b)(2)c., c)(1), d)(3), d)(4), e)(2), f)(1)g. and f)(1)h.

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)	46.6 lbs organic compounds (OC)/hr [See b)(2)d.] & 48.8 tons OC/yr 0.61 lb particulate emissions (PE)/ hr & 2.67 tons PE/yr See b)(2)a.
b.	OAC rule 3745-31-05(D)	9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined [See b)(2)b.i.] 80 tons Volatile Organic Compound (VOC)/rolling, 12-month period from emissions units P002, P801, R006, R012 through R019, R027, and R029, combined [See b)(2)b.ii. and c)(1)]
c.	OAC rule 3745-21-07(G)(2)	On any day when employing a

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		photochemically reactive material 8 lbs OC/hr & 40 lbs OC/day See b)(2)d.
d.	OAC rule 3745-17-11(B)	See b)(2)e.
e.	OAC rule 3745-17-11(C)	See b)(2)f.
f.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
g.	OAC rule 3745-114-01	See d)(6), d)(7), and d)(8)

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) requirements for this emissions unit have been determined to be the use of a dry filtration system and compliance with the requirements of 3745-21-07(G)(2) and OAC rule 3745-17-07(A).

b. The permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined.

Federally enforceable limitations of 9.0 tons of any individual HAP and 24.0 tons of any combination of HAP's per rolling, 12-month period were initially established in a permit issued on April 12, 2007 and as such the facility has existing records of HAP emissions in lieu of establishing monthly HAP emissions restrictions for the first year of operation.

ii. 80 tons Volatile Organic Compound (VOC)/rolling, 12-month period from emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined [See c)(1)].

c. This emissions unit is subject to 46.6 lbs OC/hr from coating operations at all times, except when subject to OAC rule 3745-21-07(G)(2) as specified in section b)(1)c.

d. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio=s State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part

of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

Term b)(1)c., d)(1), e)(1) and f)(1).

e. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)(a).

f. This emissions unit is not subject to the requirements specified in OAC rule 3745-17-11(C), pursuant to OAC rule 3745-17-11(C)(3), because the emissions unit was issued a permit-to-install after January 1, 1990 that identifies particulate emission limitations and control measures based on best available technology.

g. 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 maximum rolling, 12-month quantity of coating employed in emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined, is limited by the following equation:

sum[M=1,12] {sum[i=1,n](Vi Gi) ÷ 2000 lbs/ton} <= 80.0

where,

M = the increment of the rolling 12-month period;
V_i = VOC content in pounds per gallon of each coating employed
G_i = Gallons used of each coating for the rolling 12-month period
n = total number of unique coatings employed in emissions units P002, P801, R006, R012 through R019, R027, and R029.

To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of VOC (Tons)
1	20.0
1-2	25.5
1-3	30.9
1-4	36.4
1-5	41.9
1-6	47.3
1-7	52.8
1-8	58.2

1-9	63.7
1-10	69.0
1-11	74.6
1-12	80.0

After the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

(2) The permittee shall operate the dry filtration system on the paint spray booth whenever the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each day for the coating operation:

a. the company identification for each photochemically reactive coating employed;

b. the number of gallons of each photochemically reactive coating employed;

c. the organic compound content of each photochemically reactive coating, in pounds per gallon;

d. for each day during which a photochemically reactive coating is employed, the total organic compound emission rate for all photochemically reactive coatings, in pounds per day;

e. for each day during which a photochemically reactive coating is employed, the total number of hours the emissions unit was in operation; and

f. for each day during which a photochemically reactive coating is employed, the average hourly organic compound emission rate for all photochemically reactive coatings, [i.e., d)(1)d./d)(1)e.], in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of Aphotochemically reactive@ and Anonphotochemically reactive@ are based upon OAC rule 3745-21-01(C)(5).]

(2) The permittee shall collect and record the following information each month for the purpose of determining annual organic compound emissions:

a. the company identification for each coating employed;

b. the number of gallons of each coating employed;

c. the organic compound content of each coating, in pounds per gallon;

d. the organic compound emission rate for each coating material employed [d)(2)b. times d)(2)c.], in pounds;

e. the total organic compound emission rate for all coatings [summation of d)(2)d.], in pounds; and

f. the annual, year-to-date organic compound emissions for all coatings, in pounds.

(3) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP) that are applied in emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined:

a. the name and identification number/code of each HAP-containing material;

b. the name/identification of each individual HAP contained in each material applied [and identified in d)(3)a. above] and the pound(s) of each HAP per gallon of each HAP-containing material applied;

c. the number of gallons of each HAP-containing material applied during the month;

d. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of d)(3)b. times d)(3)c. for all the materials applied during the month, divided by 2,000 pounds;

e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from d)(3)d. above;

f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in d)(3)d. above, for the present month plus the previous 11 months of operation, in ton(s); and

g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in d)(3)e. above, for the present month plus the previous 11 months of operation, in ton(s).

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

(4) The permittee shall collect and record the following information each month for all materials containing any volatile organic compound (VOC) that are applied in emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined:

a. the company name or identification for each VOC containing material employed;

b. the volume, in gallons, of each VOC-containing material employed;

c. the VOC content of each VOC-containing material employed, in pounds per gallon, as applied;

d. the VOC emission rate, in pounds, for each VOC-containing material employed [d)(4)b. times d)(4)c.];

e. the total VOC emission rate from all VOC-containing materials employed [summation of d)(4)d.], in pounds or tons;

f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total VOC emissions, in tons; and

g. beginning the first month, after the first 12 months of operation under the provisions of this permit, the rolling, 12-month VOC emission rates, in tons.

(5) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

(6) The permit to install for this emissions unit R029 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's “Review of New Sources of Air Toxic Emissions” policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the “worst case” pollutant(s):

Pollutant: methyl amyl ketone

TLV (ug/m3): 233,000

Maximum Hourly Emission Rate (lbs/hr): 47.6 (includes clean-up)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4186

MAGLC (ug/m3): 5550

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

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

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

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

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

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

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

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

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

e) Reporting Requirements

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

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

i. 9.00 tons per rolling, 12-month period for any individual HAP for emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined;

ii. 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined; and

iii. 80 tons Volatile Organic Compound (VOC)/rolling, 12-month period from emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels;

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

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

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

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

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

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

f) Testing Requirements

(1) Compliance with the emission limitations(s) in Section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitations:

On any day when employing a photochemically reactive coating material, 8 lbs OC/hr & 40 lbs OC/day

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in section d)(1) of this permit.

b. Emission Limitation:

46.4 lbs OC/hr

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit.* Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on a maximum emission rate of 3.6 lbs OC per gallon combined with an hourly usage rate of 12.9 gallons per hour.

c. Emission Limitation:

48.8 tons OC/yr

Applicable Compliance Method:

The annual OC emission limitation represents the potential to emit of the emissions unit and is based on inherent limitations associated with product molding throughput capacities. Compliance shall be verified based on the record keeping requirements as specified in Section d)(2) of this permit.

d. Emission Limitation:

0.61 lb PE /hr

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

If required, compliance with the hourly PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

e. Emission Limitation:

2.67 ton PE /yr

Applicable Compliance Method:

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

f. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance U.S. EPA Method 9, 40 CFR Part 60, Appendix A.

g. Emission Limitations:

9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section d)(3) of this permit.

h. Emission Limitation

80 tons VOCs/rolling, 12-month period, from emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined.

Applicable Compliance Method

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

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group - Painting Operations: R006, R012, R013, R014, R015, R016, R017, R018, R019, and R027

EU ID	Operations, Property and/or Equipment Description
R006	Paint booth 6 (spray booth w/filters).
R012	Paint booth 12 (spray booth w/filters)
R013	Paint booth 13 (spray booth w/filters)
R014	Paint booth 14 (spray booth w/filters).
R015	Paint booth 15 (spray booth w/filters)
R016	Paint booth 16 (spray booth w/filters)
R017	Paint booth 17 (spray booth w/filters).
R018	Paint booth 18 (spray booth w/filters).
R019	Paint booth 19 (spray booth w/filters).
R027	Paint booth 27 (spray booth w/filters).

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. None.

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined [See b)(2)a.i.] 80 tons Volatile Organic Compound (VOC)/rolling, 12-month period from for

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined [See b)(2)a.ii. and c)(1)]
b.	OAC rule 3745-21-07(G)	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)c.
d.	OAC rule 3745-17-11(C)	See b)(2)d., c)(2) and c)(3)
e.	OAC rule 3745-17-07(A)	See b)(2)e.

(2) Additional Terms and Conditions

a. The permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined.

Federally enforceable limitations of 9.0 tons of any individual HAP and 24.0 tons of any combination of HAP's per rolling, 12-month period were initially established in a permit issued on April 12, 2007 and as such the facility has existing records of HAP emissions in lieu of establishing monthly HAP emissions restrictions for the first year of operation.

ii. 80 tons Volatile Organic Compound (VOC)/rolling, 12-month period from emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined [See c)(1)].

b. OAC Rule 3745-21-07(G) does not apply to this emissions unit because the facility is not located in a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-31-06, and is not a "new source."

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

c. The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Williams County.

d. 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.

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

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

c) Operational Restrictions

(1) The maximum rolling, 12-month quantity of VOC containing materials employed in emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined, is limited by the following equation:

sum[M=1,12] {sum[i=1,n](Vi Gi) ÷ 2000 lbs/ton} <= 80.0

where,

M = the increment of the rolling 12-month period;
V_i = VOC content in pounds per gallon of each material employed
G_i = Gallons used of each VOC containing material for the rolling 12-month period
n = total number of unique VOC containing materials employed in emissions units P002, P801, R006, R012 through R019, R027, and R029.

To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of VOC (Tons)
1	20.0
1-2	25.5
1-3	30.9
1-4	36.4
1-5	41.9
1-6	47.3
1-7	52.8
1-8	58.2
1-9	63.7
1-10	69.0
1-11	74.6
1-12	80.0

After the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

(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 month for all materials containing any hazardous air pollutant (HAP) that are applied in emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined:

a. the name and identification number/code of each HAP-containing material;

b. the name/identification of each individual HAP contained in each material applied [and identified in d)(1)a. above] and the pound(s) of each HAP per gallon of each HAP-containing material applied;

c. the number of gallons of each HAP-containing material applied during the month;

d. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of d)(1)b. times d)(1)c. for all the materials applied during the month, divided by 2,000 pounds;

e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from d)(1)d. above;

f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in d)(1)d. above, for the present month plus the previous 11 months of operation, in ton(s); and

g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in d)(1)e. above, for the present month plus the previous 11 months of operation, in ton(s).

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.

(2) The permittee shall collect and record the following information each month for all materials containing any volatile organic compound (VOC) that are applied in emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined:

a. the company name or identification for each VOC-containing material employed;

b. the volume, in gallons, of each VOC containing material employed;

c. the VOC content of each VOC-containing material employed, in pounds per gallon, as applied;

d. the VOC emission rate, in pounds, for each VOC-containing material employed [d)(2)b. times d)(2)c.];

e. the total VOC emission rate from all VOC-containing materials employed [summation of d)(2)d.], in pounds or tons;

f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total VOC emissions, in tons; and

g. beginning the first month, after the first 12 months of operation under the provisions of this permit, the rolling, 12-month VOC emission rates, in tons.

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

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

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

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

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be

made available to the appropriate Ohio EPA District Office or local air agency upon request.

(7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(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.

e) Reporting Requirements

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

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

i. 9.00 tons per rolling, 12-month period for any individual HAP for emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined;

ii. 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined; and

iii. 80 tons Volatile Organic Compound (VOC)/rolling, 12-month period from emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels;

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

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

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

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

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date

identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation

9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in Section d)(1) of this permit.

b. Emission Limitation

80 tons VOCs/rolling, 12-month period from for emissions units P002, P801, R006, R012 through R019, R027, and R029 , combined.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements in section d)(2) of this permit.

g) Miscellaneous Requirements

(1) None.