



State of Ohio Environmental Protection Agency

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

7/29/2009

Lee Winer  
CVG Acquisition LLC  
55 North Garfield Street  
Norwalk, OH 44852

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0339020133  
Permit Number: P0104735  
Permit Type: OAC Chapter 3745-31 Modification  
County: Huron

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install 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, Norwalk-Reflector. 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 Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install 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 Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*  
Ohio EPA-NWDO; Michigan; Canada

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



PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install and Operate  
CVG Acquisition LLC

Issue Date: 7/29/2009  
Permit Number: P0104735  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Description: Electrodeposition coating operation, primer repair operation, coach joint sealer operation  
and facility cleanup  
Facility ID: 0339020133  
Facility Location: CVG Acquisition LLC  
55 North Garfield Street,  
Norwalk, OH 44852  
Facility Description: Motor Vehicle Body Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, 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 Donald Waltermeyer at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road or (419)352-8461. The permit can be downloaded from the Web page: [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc)





### Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

CVG Acquisitions has submitted a PTIO application for four (4) emissions units (EUs) to complete the transition of the facility from TV to SMTV status. The PTIO will also resolve outstanding NOVs for the use of non-compliant coatings and exceedances of the facility wide cleanup VOC limit.

- K003 Electrodeposition coating operation and associated curing oven
- K016 Primer repair operation
- K017 Coach joint sealer operation
- P801 Facility wide clean-up operations

3. Facility Emissions and Attainment Status:

CVG Acquisitions is transitioning from TV to SMTV status. The facility is located in Huron County, and the county is in attainment for all criteria pollutants.

4. Source Emissions:

K003 Electrodeposition coating operation and associated curing oven: 22.25 lbs VOC/hr, restricted to use of compliant coatings, 3.0 lbs VOC/gallon excluding water and exempt solvents

Combined limits for K003, K016, K017 and P801 of:  
50.0 tons VOC per rolling 12-month period,  
9.5 tons per rolling, 12-month period for any individual HAP, and  
24.0 tons per rolling, 12-month period for any combination of HAPs

K016 Primer repair operation: 62.2 lbs OC/day, restricted to use of 10 gallons/day of coatings (w/maximum OC of 6.22 lbs OC/gallon)  
Same combined limits as listed in K003

K017 Coach joint sealer operation: 0.12 lbs VOC/hr, restricted to use of compliant coatings, 3.0 lbs VOC/gallon excluding water and exempt solvents  
Same combined limits as listed in K003

P801 Facility wide clean-up operations: 3,300 lbs OC/month  
Same combined limits as listed in K003



State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Permit Strategy Write-Up**  
**Permit Number:** P0104735  
**Facility ID:** 0339020133

5. Conclusion:

Issuance of this PTIO will transition the facility to SMTV status, and resolve outstanding NOV issues.

6. Please provide additional notes or comments as necessary:

The PE limits shall terminate upon U.S. EPA approval of the Ohio SIP for particulate emissions.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>VOC</u>	<u>50.0</u>
<u>HAP (individual)</u>	<u>9.5</u>
<u>HAPs (combined)</u>	<u>24.0</u>
<u>PE</u>	<u>4.8</u>



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

**DRAFT**

**Air Pollution Permit-to-Install and Operate  
for  
CVG Acquisition LLC**

Facility ID: 0339020133  
Permit Number: P0104735  
Permit Type: OAC Chapter 3745-31 Modification  
Issued: 7/29/2009  
Effective: To be entered upon final issuance  
Expiration: To be entered upon final issuance





**Air Pollution Permit-to-Install and Operate**  
for  
CVG Acquisition LLC

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104735

**Facility ID:** 0339020133

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0339020133

Application Number(s): A0018203, A0018204, A0037073

Permit Number: P0104735

Permit Description: Electrodeposition coating operation, primer repair operation, coach joint sealer operation and facility cleanup

Permit Type: OAC Chapter 3745-31 Modification

Permit Fee: \$400.00 *DO NOT send payment at this time - subject to change before final issuance*

Issue Date: 7/29/2009

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:

CVG Acquisition LLC  
55 North Garfield Street  
Norwalk, OH 44852

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



State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104735

**Facility ID:** 0339020133

**Effective Date:** To be entered upon final issuance

## Authorization (continued)

Permit Number: P0104735  
 Permit Description: Electrodeposition coating operation, primer repair operation, coach joint sealer operation and facility cleanup

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

<b>Emissions Unit ID:</b>	<b>K003</b>
Company Equipment ID:	Electrodeposition Coating Operation
Superseded Permit Number:	03-17226
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K016</b>
Company Equipment ID:	Primer repair
Superseded Permit Number:	03-17226
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K017</b>
Company Equipment ID:	Coach Joint Sealer
Superseded Permit Number:	03-17226
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P801</b>
Company Equipment ID:	Facility Clean Up
Superseded Permit Number:	03-17226
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:** P0104735

**Facility ID:** 0339020133

**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 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.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104735

**Facility ID:** 0339020133

**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**

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## **B. Facility-Wide Terms and Conditions**



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104735

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1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104735

**Facility ID:** 0339020133

**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. K003, Electrodeposition Coating Operation**

**Operations, Property and/or Equipment Description:**

Electrodeposition coating operation and associated curing oven.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	22.25 pounds volatile organic compounds (VOC)/hr  See b)(2)a.
b.	OAC rule 3745-31-05(D)	50.00 tons VOC per rolling, 12-month period for emission units K003, K016, K017 and P801, combined [See b)(2)b.]  9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.0 tons per rolling, 12-month period for any combination of HAPs for emission units K003, K016, K017 and P801, combined [See b)(2)b.]
c.	OAC rule 3745-21-09(U)(1)(i)	3.0 pounds VOC per gallon of coating, excluding water and exempt solvents [for miscellaneous metal coatings not regulated under paragraphs (U)(1)(a) to (U)(1)(h) of OAC rule 3745-21-09] [See b)(2)d.]

(2) Additional Terms and Conditions

a. The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-21-09(U)(1)(i).

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



- i. 50.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K003, K016, K017 and P801, combined [See c)(1)].
- ii. Annual HAP emissions from emissions units K003, K016, K017 and P801 combined, shall not exceed 9.50 tons per rolling, 12-month period for any individual HAP or 24.00 tons per rolling, 12-month period for any combination of HAPs.

A rolling 12-month limitation for HAP emissions from emissions units K003, K016, K017 and P801, combined, was most recently established in Permit to Install #03-17226 issued on December 26, 2006 and, as such, rolling emissions records exist. The applicant shall use these existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

- c. The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.
- d. The VOC content, excluding water and exempt solvents, restriction as contained in 3745-21-09(U)(1)(d) applies to the coating in the dip tank, as applied. The VOC content restriction also applies to the addition of make-up material to the dip tank, as applied. [See d)(2)]

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of materials containing VOCs (coatings, thinning solvents, coating additives, sealers, cleanup materials, etc.) employed in emissions units K003, K016, K017 and P801, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(V_i)(G_i)] \div 2000 \text{ lbs/ton} \leq 50.00$$

where,

M = the increment of the rolling 12-month period;

V<sub>i</sub> = VOC content in pounds per gallon of each material containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) employed

G<sub>i</sub> = Gallons used of each material containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) for the rolling 12 month period

n = total number of unique materials containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) employed in emission units K003, K016, K017 and P801.



A rolling 12-month limitation for VOC emissions from emissions units K003, K016, K017 and P801, combined, was most recently established in Permit to Install #03-17226 issued on December 26, 2006 and, as such, rolling emissions records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for emissions unit K003:
  - a. the name and identification number of each coating employed;
  - b. the VOC content of the coating (excluding water and exempt solvents), as applied, in lbs/gal [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B) (8) of OAC rule 3745-21-10 for  $C_{VOC,2}$ ];
- (2) The permittee shall collect and record the following information for each addition of make-up material(s) (such as coating, solvent, coating additives, etc.) to the dip tank:
  - a. the VOC content excluding water and exempt solvents of the make-up material added or if more than one material is added at one time, the VOC content excluding water and exempt solvents of the resulting mixture of the materials added to the dip tank. [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B) (8) of OAC rule 3745-21-10 for  $C_{VOC,2}$ ];
  - b. if make-up materials are added to the dip tank on a continuous basis, the permittee shall calculate the VOC content excluding water and exempt solvents of the resulting mixture of the materials added to the dip tank once per day for all make-up materials added during the given day.
- (3) The permittee shall maintain monthly records of the following information for emissions units K003, K016, K017 and P801, 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 for each VOC containing material employed, in lbs [d)(3)b. x d)(3)c.];
  - e. the total VOC emission rate for all VOC containing materials employed, in lbs [summation of d)(3)d.];
  - f. the rolling 12-month summation of VOC emissions from the VOC containing material employed in tons, prior to any credit claimed for solvent recycling.



- (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 [d)(4)b. x d)(4)c.], and the date of each such shipment or record of credit;
  - 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, and
  - f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.
  
- (5) The permittee shall collect and record the following HAP information each month for emissions units K003, K016, K017 and P801, combined:
  - a. the company identification of each HAP containing material employed;
  - b. the amount of each individual HAP in each HAP containing material, in lbs/gallon, as applied;
  - c. the number of gallons of each HAP containing material employed;
  - d. the emission rate for each individual HAP from each HAP containing material employed [d)(5)b. x d)(5)c.] for each individual HAP, in lbs;
  - e. the total emission rate for each individual HAP from all the HAP containing materials employed (for each individual HAP, the summation of d)(5)d. for all HAP containing materials), in lbs;
  - f. the total HAP emission rate for all HAPs combined from all the HAP containing materials employed (summation of d)(5)e. for all HAPs for all HAP containing materials), in lbs;
  - g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.



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. All exceedances of the rolling, 12-month VOC emission limitation of 50.00 tons (for emissions units K003, K016, K017 and P801, combined).
    - ii. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.50 tons and 24.00 tons, respectively (for emissions units K003, K016, K017 and P801, 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); and
  - d. the magnitude and duration of each deviation (excursion).

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

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

- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying material (i.e. coatings and dip tank make-up additions, b)(2)d.). 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 30 days following the end of the calendar month.
- (3) 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) of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
22.25 lbs VOC/hr



Applicable Compliance Method:

The hourly allowable VOC emission limitation above represents the potential to emit for this emissions unit and was established by multiplying the maximum hourly coatings usage rate (7.42 gallons per hour) by the maximum allowable VOC content of the coating (3.0 pounds per gallon).

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

b. Emission Limitation:

50.00 tons of VOC per rolling, 12-month period for emissions units K003, K016, K017 and P801, combined

Applicable Compliance Method: Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in d)(3) and d)(4) of this permit.

c. Emission Limitation:

9.50 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 K003, K016, K017 and P801, combined

Applicable Compliance Method:

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

Formulation data or US EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the VOC content of materials.

d. Emission Limitation:

3.0 lbs VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in d)(1) and d)(2).

g) Miscellaneous Requirements

(1) None.



**2. K016, Primer repair**

**Operations, Property and/or Equipment Description:**

Primer repair operation

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	62.2 pounds organic compounds (OC)/day  See b)(2)a.
b.	OAC rule 3745-31-05(D)	50.00 tons VOC per rolling, 12-month period for emission units K003, K016, K017 and P801 combined [See b)(2)b.]  9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.0 tons per rolling, 12-month period for any combination of HAPs for emission units K003, K016, K017 and P801, combined [See b)(2)b.]
c.	OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr  See b)(2)c.
d.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.  See b)(2)c.
e.	OAC rule 3745-17-11(C)	See b)(2)d. and c)(1)
f.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)e.

(2) Additional Terms and Conditions

a. The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-21-09(U)(2)(e)(iii).



- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
  - i. 50.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K003, K016, K017 and P801 combined [See c)(1)].
  - ii. Annual HAP emissions from emissions units K003, K016, K017 and P801, combined, shall not exceed 9.50 tons per rolling, 12-month period for any individual HAP or 24.00 tons per rolling, 12-month period for any combination of HAPs.

A rolling 12-month limitation for HAP emissions from emissions units K003, K016, K017 and P801, combined was most recently established in Permit to Install #03-17226 issued on December 26, 2006 and, as such, rolling emissions records exist. The applicant shall use these existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

- c. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio State Implementation Plan (SIP) for particulate emissions.
- d. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling of particulate emissions from surface coating processes. Paragraph (C) of OAC rule 3745-17-11, and c)(1) of this permit for this emissions unit, shall be federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio SIP.
- e. The permittee shall not employ more than ten gallons of coatings per day for the miscellaneous metal parts and products coating line.

c) Operational Restrictions

- (1) The spray coating operation for this emissions unit shall be controlled by a dry particulate filter. The permittee shall follow all of these work practices:
  - a. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry filtration system with any modifications deemed necessary by the permittee during the time period in which the dry filtration system is utilized.
  - b. The permittee shall operate the dry filtration system in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.
  - c. The permittee shall conduct periodic inspections of the dry filtration system to determine whether the device is operating in accordance with the manufacturer's



recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry filtration system while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

- d. The permittee shall document each inspection of the dry filtration system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.
- e. In the event that the dry filtration system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control device is not operating in accordance with such requirements.

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

- (2) The maximum rolling, 12-month quantity of materials containing VOC (coatings, thinning solvents, coating additives, sealers, cleanup materials, etc.) employed in emissions units K003, K016, K017 and P801, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(V_i)(G_i)] \div 2000 \text{ lbs/ton} \leq 50.00$$

where,

M = the increment of the rolling 12-month period;

V<sub>i</sub> = VOC content in pounds per gallon of each material containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) employed

G<sub>i</sub> = Gallons used of each material containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) for the rolling 12 month period

n = total number of unique materials containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) employed in emission units K003, K016, K017 and P801.

A rolling 12-month limitation for VOC emissions from emissions units K003, K016, K017 and P801, combined, was most recently established in Permit to Install #03-17226



issued on December 26, 2006 and, as such, rolling emissions records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

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 OC content of each coating employed, in pounds per gallon, as applied
- c. the number of gallons of each coating employed
- d. the total number of gallons of all the coatings employed
- e. the OC emission rate for each coating, in lbs/day  $[d)(1)b. \times d)(1)c.]$
- f. the total OC emission rate for all coatings, in lbs/day  $[\text{sum of } d)(1)e.]$

(2) The permittee shall maintain monthly records of the following information for emissions units K003, K016, K017 and P801, 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 for each VOC containing material employed, in lbs  $[d)(3)b. \times d)(3)c.]$ ;
- e. the total VOC emission rate for all VOC containing materials employed, in lbs  $[\text{summation of } d)(3)d.]$ ;
- f. the rolling 12-month summation of VOC emissions from the VOC containing material employed in tons, prior to any credit claimed for solvent recycling.

(3) 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)(3)b. x d)(3)c.], and the date of each such shipment or record of credit;
  - 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)(3)d., for each shipment recorded during the rolling 12 month period, and
  - f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.
- (4) The permittee shall collect and record the following HAP information each month for emissions units K003, K016, K017 and P801, combined:
- a. the company identification of each HAP containing material employed;
  - b. the amount of each individual HAP in each HAP containing material, in lbs/gallon, as applied;
  - c. the number of gallons of each HAP containing material employed;
  - d. the emission rate for each individual HAP from each HAP containing material employed [d)(4)b. x d)(4)c.] for each individual HAP, in lbs;
  - e. the total emission rate for each individual HAP from all the HAP containing materials employed (for each individual HAP, the summation of d)(4)d. for all HAP containing materials), in lbs;
  - f. the total HAP emission rate for all HAPs combined from all the HAP containing materials employed (summation of d)(4)e. for all HAPs for all HAP containing materials), in lbs;
  - g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
- 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. All exceedances of the daily OC emission limitation of 62.2 pounds (from the use of coatings) for this emission unit.



- ii. All exceedances of the rolling, 12-month VOC emission limitation of 50.00 tons (for emissions units K003, K016, K017 and P801 combined).
- iii. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.50 tons and 24.00 tons, respectively (for emissions units K003, K016, K017 and P801 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); and
- d. the magnitude and duration of each deviation (excursion).

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

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

- (2) The permittee shall notify the Northwest District Office in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs.
- (3) 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) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:  
62.2 pounds OC/day

Applicable Compliance Method:  
Compliance shall be demonstrated through the monitoring and record keeping requirements established in d)(1).

b. Emission Limitation: 50.00 tons of VOC per rolling, 12-month period for emissions units K003, K016, K017 and P801, combined



Applicable Compliance Method: Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in d)(2) and d)(3) of this permit.

- c. Emission Limitation:  
9.50 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 K003, K016, K017 and P801, combined.

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements as specified in d)(4).

Formulation data or US EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the VOC content of materials.

- d. Emission Limitation:  
Coating usage shall not exceed 10 gallons per day.

Applicable Compliance Method:  
Compliance with the coating usage restriction shall be based upon the recordkeeping requirements established in d)(1).

g) Miscellaneous Requirements

- (1) None.



**3. K017, Coach Joint Sealer**

**Operations, Property and/or Equipment Description:**

Coach joint sealer operation (formerly included as part of K003)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	0.12 pound volatile organic compounds (VOC)/hr  See b)(2)a.
b.	OAC rule 3745-31-05(D)	50.00 tons VOC per rolling, 12-month period for emission units K003, K016, K017 and P801 combined [See b)(2)b.]  9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.0 tons per rolling, 12-month period for any combination of HAPs for emission units K003, K016, K017 and P801, combined [See b)(2)b.]
c.	OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr  See b)(2)c.
d.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.  See b)(2)c.
e.	OAC rule 3745-17-11(C)	See b)(2)d. and c)(1)
f.	OAC rule 3745-21-09(U)(1)(i)	3.0 pounds VOC per gallon of coating, excluding water and exempt solvents [for miscellaneous metal coatings not regulated under paragraphs (U)(1)(a) to (U)(1)(h) of OAC rule 3745-21-09] [See b)(2)f.]



(2) Additional Terms and Conditions

- a. The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-21-09(U)(1)(i).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
  - i. 50.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K003, K016, K017 and P801 combined [See c)(1)].
  - ii. Annual HAP emissions from emissions units K003, K016, K017 and P801 combined, shall not exceed 9.50 tons per rolling, 12-month period for any individual HAP or 24.00 tons per rolling, 12-month period for any combination of HAPs.

A rolling 12-month limitation for HAP emissions from emissions units K003, K016, K017 and P801 combined was most recently established in Permit to Install #03-17226 issued on December 26, 2006 and, as such, rolling emissions records exist. The applicant shall use these existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

- c. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio State Implementation Plan (SIP) for particulate emissions.
- d. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling of particulate emissions from surface coating processes. Paragraph (C) of OAC rule 3745-17-11, and c)(1) of this permit for this emissions unit, shall be federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio SIP.
- e. The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with this emission limitation.
- f. The VOC content, excluding water and exempt solvents, restriction as contained in 3745-21-09(U)(1)(d) applies to the coating, as applied.

c) Operational Restrictions

- (1) The spray coating operation for this emissions unit shall be controlled by a dry particulate filter. The permittee shall follow all of these work practices:
  - a. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry filtration system



with any modifications deemed necessary by the permittee during the time period in which the dry filtration system is utilized.

- b. The permittee shall operate the dry filtration system in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.
- c. The permittee shall conduct periodic inspections of the dry filtration system to determine whether the device is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry filtration system while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
- d. The permittee shall document each inspection of the dry filtration system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.
- e. In the event that the dry filtration system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control device is not operating in accordance with such requirements.

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

- (2) The maximum rolling, 12-month quantity of materials containing VOC (coatings, thinning solvents, coating additives, sealers, cleanup materials, etc.) employed in emissions units K003, K016, K017 and P801, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(V_i)(G_i)] \div 2000 \text{ lbs/ton} \leq 50.00$$

where,

M = the increment of the rolling 12-month period;

V<sub>i</sub> = VOC content in pounds per gallon of each material containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) employed



$G_i$  = Gallons used of each material containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) for the rolling 12 month period

$n$  = total number of unique materials containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) employed in emission units K003, K016, K017 and P801.

A rolling, 12-month limitation for VOC emissions from emissions units K003, K016, K017 and P801, combined, was most recently established in Permit to Install #03-17226 issued on December 26, 2006 and, as such, rolling emissions records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for emissions unit K017:

- a. the name and identification number of each coating employed;
- b. the VOC content of the coating (excluding water and exempt solvents), as applied, in lbs/gal [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B) (8) of OAC rule 3745-21-10 for  $C_{VOC,2}$ ];

(2) The permittee shall maintain monthly records of the following information for emissions units K003, K016, K017 and P801, 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 for each VOC containing material employed, in lbs [d)(3)b. x d)(3)c.];
- e. the total VOC emission rate for all VOC containing materials employed, in lbs [summation of d)(3)d.];
- f. the rolling 12-month summation of VOC emissions from the VOC containing material employed in tons, prior to any credit claimed for solvent recycling.

(3) 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)(3)b. x d)(3)c.], and the date of each such shipment or record of credit;
  - 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)(3)d., for each shipment recorded during the rolling 12 month period, and
  - f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.
- (4) The permittee shall collect and record the following HAP information each month for emissions units K003, K016, K017 and P801, combined:
- a. the company identification of each HAP containing material employed;
  - b. the amount of each individual HAP in each HAP containing material, in lbs/gallon, as applied;
  - c. the number of gallons of each HAP containing material employed;
  - d. the emission rate for each individual HAP from each HAP containing material employed [d)(3)b. x d)(3)c.] for each individual HAP, in lbs;
  - e. the total emission rate for each individual HAP from all the HAP containing materials employed (for each individual HAP, the summation of d)(4)d. for all HAP containing materials), in lbs;
  - f. the total HAP emission rate for all HAPs combined from all the HAP containing materials employed (summation of d)(3)e. for all HAPs for all HAP containing materials), in lbs;
  - g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
- 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. All exceedances of the rolling, 12-month VOC emission limitation of 50.00 tons (for emissions units K003, K016, K017 and P801, combined).
- ii. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.50 tons and 24.00 tons, respectively (for emissions units K003, K016, K017 and P801, 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); and
- d. the magnitude and duration of each deviation (excursion).

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

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

- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying material [i.e. coatings, b)(2)d.] 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 30 days following the end of the calendar month.
- (3) 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) of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation  
0.12 lb VOC/hr

Applicable Compliance Method

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (1.0 gallon per hour) by the maximum allowable OC content of the coating (0.12 pound per gallon).



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

- b. Emission Limitation: 50.00 tons of VOC per rolling, 12-month period for emissions units K003, K016, K017 and P801 combined

Applicable Compliance Method: Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in d)(2) and d)(3) of this permit.

- c. Emission Limitation  
9.50 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 K003, K016, K017 and P801, combined

Applicable Compliance Method  
Compliance shall be based upon the record keeping requirements as specified in d)(4).

Formulation data or US EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the VOC content of materials.

- d. Emission Limitation:  
3.0 lbs VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements as specified in d)(1).

- g) Miscellaneous Requirements

- (1) None.



**4. P801, Facility Clean Up**

**Operations, Property and/or Equipment Description:**

Facility wide clean-up operations.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	3,300 pounds organic compounds (OC)/month  See b)(2)a.
b.	OAC rule 3745-31-05(D)	50.00 tons VOC per rolling, 12-month period for emission units K003, K016, K017 and P801, combined [See b)(2)b.]  9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.0 tons per rolling, 12-month period for any combination of HAPs for emission units K003, K016, K017 and P801 combined [See b)(2)b.]
c.	OAC rule 3745-21-07	None. [See b)(2)b.]
d.	OAC rule 3745-21-09	None. [See b)(2)b.]

(2) Additional Terms and Conditions

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

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



- i. 50.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K003, K016, K017 and P801, combined [See c)(1).]
- ii. Annual HAP emissions from emissions units K003, K016, K017 and P801, combined, shall not exceed 9.50 tons per rolling, 12-month period for any individual HAP or 24.00 tons per rolling, 12-month period for any combination of HAPs.

A rolling, 12-month limitation for HAP emissions from emissions units K003, K016, K017 and P801 combined was most recently established in Permit to Install #03-17226 issued on December 26, 2006 and, as such, rolling emissions records exist. The applicant shall use these existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

- c. Emissions from P801 were previously accounted for in K003 when issued in 03-08762 on 5/3/1995. Emissions from clean-up operations associated with that coating line have been separated to ease recordkeeping and reporting. Emissions associated with clean-up operations from K003, K016, and K017 are not subject to OAC rule 3745-21-07 because of OAC rule 3745-21-09 applicability to emission units K003, K016, and K017.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of materials containing VOC (coatings, thinning solvents, coating additives, sealers, cleanup materials, etc.) employed in emissions units K003, K016, K017 and P801, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(V_i)(G_i)] \div 2000 \text{ lbs/ton} \leq 50.00$$

where,

M = the increment of the rolling 12-month period;

V<sub>i</sub> = VOC content in pounds per gallon of each material containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) employed

G<sub>i</sub> = Gallons used of each material containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) for the rolling 12 month period

n = total number of unique materials containing VOC (coating, thinning solvent, coating additive, sealer, cleanup material, etc.) employed in emission units K003, K016, K017 and P801.

A rolling 12-month limitation for VOC emissions from emissions units K003, K016, K017 and P801, combined was most recently established in Permit to Install #03-17226 issued on December 26, 2006 and, as such, rolling emissions records exist. The applicant shall



use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for clean-up material usage for the entire facility (emissions unit P801):
  - a. the company identification for each cleanup material employed;
  - b. the number of gallons of each cleanup material employed;
  - c. the organic compound content of each cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all cleanup materials, in pounds
- (2) The permittee shall maintain monthly records of the following information for emissions units K003, K016, K017 and P801, 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 for each VOC containing material employed, in lbs [d)(3)b. x d)(3)c.];
  - e. the total VOC emission rate for all VOC containing materials employed, in lbs [summation of d)(3)d.];
  - f. the rolling 12-month summation of VOC emissions from the VOC containing material employed in tons, prior to any credit claimed for solvent recycling
- (3) 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 [d)(3)b. x d)(3)e.], 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)(3)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.
- (4) The permittee shall collect and record the following HAP information each month for emissions units K003, K016, K017 and P801, combined:
- a. the company identification of each HAP containing material employed;
  - b. the amount of each individual HAP in each HAP containing material, in lbs/gallon, as applied;
  - c. the number of gallons of each HAP containing material employed;
  - d. the emission rate for each individual HAP from each HAP containing material employed [d)(2)b. x d)(2)c.] for each individual HAP, in lbs;
  - e. the total emission rate for each individual HAP from all the HAP containing materials employed (for each individual HAP, the summation of d)(4)d. for all HAP containing materials), in lbs;
  - f. the total HAP emission rate for all HAPs combined from all the HAP containing materials employed (summation of d)(4)e. for all HAPs for all HAP containing materials), in lbs; and
  - g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
- 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. All exceedances of the rolling, 12-month VOC emission limitation of 50.00 tons for emissions units K003, K016, K017 and P801, combined
    - ii. All exceedances of the maximum allowable cumulative VOC containing material usage rates specified in section c)(1).



- iii. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.50 tons and 24.00 tons, respectively (for emissions units K003, K016, K017 and P801, combined).
- iv. All exceedances of the 3,300 lbs OC/month emission limitation.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

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

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

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation:  
3,300 lbs OC/month

Applicable Compliance Method:

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

- b. Emission Limitation:  
50.00 tons of VOC per rolling, 12-month period for emissions units K003, K016, K017 and P801, combined.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in section d)(2) and d)(3) of this permit.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104735

**Facility ID:** 0339020133

**Effective Date:** To be entered upon final issuance

- c. Emission Limitation:  
9.50 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 K003, K016, K017 and P801, combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in d)(4).

Formulation data or US EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the VOC content of materials.

g) Miscellaneous Requirements

- (1) None.