State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

8/13/2009

Certified Mail

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

Allen Francis
Production Paint Finishers, Inc.
140 Center Street
Bradford, OH 45308-0127

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0819030169
Permit Number: P0104859
Permit Type: Initial Installation
County: Darke

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install 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 public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Greenville Daily Advocate. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.state.oh.us/dapc in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and

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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install 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 is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA
RAPCA; Indiana

Darke County

PUBLIC NOTICE
Issuance Of Draft Air Pollution Permit-To-Install
Production Paint Finishers, Inc.

Issue Date: 8/13/2009
Permit Number: P0104859
Permit Type: Initial Installation
Permit Description: Chapter 31 modification fro emissions units K001, K004 and K006 and the initial installation of emissions units K007 and K008.
Facility ID: 0819030169
Facility Location: Production Paint Finishers, Inc.
140 Center Street,
Bradford, OH 45308-0127
Facility Description: Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. 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 Andrew Weisman at Regional Air Pollution Control Agency, 117 South Main Street or (937)225-4435. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   ___ Netting Determination

2. Source Description:

   Production Paint Finishers, Inc. (PPF) (Ohio EPA Facility ID 0819030169) is located in Bradford, (Darke County) Ohio. PPF currently operates four miscellaneous metal parts coating lines identified as Ohio EPA emissions units K001, K004, K005 and K006. PPF has applied for modified PTIs that reflect current and future operations for emissions units K001, K004, and K006 and a new PTI for the installation of emissions unit K007 that addresses the use of caulks and sealants across the entire facility and a new metal parts coating line identified as emissions unit K008 that will replace emissions unit K005. Emissions unit K005 will be permanently shut down.

3. Facility Emissions and Attainment Status:

   There are no ambient air quality monitors located in Darke County; therefore, its attainment status with regard to the National Ambient Air Quality Standards (NAAQS) is not classifiable. The potential volatile organic compound (VOC) emissions from PPF are over 500 tons per year.

4. Source Emissions:

   Based on the results of the Best Available Control Technology (BACT) analysis completed for PPF, the potential uncontrolled VOC emissions from emissions units K001, K005 and K006 combined are 501 tons per year. At this potential emissions rate PPF is a major source subject to major New Source Review (NSR) including BACT and Title V operating permit requirements.

   PPF has elected to implement synthetic minor restrictions on emissions units K001, K006 and K008 that would achieve BACT equivalent emissions reductions. These reductions will be achieved through the voluntary use of more efficient coating application technology (electrostatic spray technology), the use of lower VOC content coatings and rolling 12-month coating volume restrictions. VOC emissions from emissions units K001, K006 and K008 will be restricted to 120 tons on a rolling 12-month basis.

   The terms and conditions of this permit also include 8.20 tons per year of VOC emissions from emissions unit K004 and 8.90 tons per year from emissions unit K007.

5. Conclusion:

   By limiting the VOC use and emissions from emissions units K001, K006 and K008 on a rolling 12-month basis to 120 tons, the need to comply major NSR provisions will be precluded.

6. Please provide additional notes or comments as necessary:

   None

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

Pollutant	Tons Per Year
VOC	137.1*

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

Air Pollution Permit-to-Install
for
Production Paint Finishers, Inc.

Facility ID: 0819030169
Permit Number: P0104859
Permit Type: Initial Installation
Issued: 8/13/2009
Effective: To be entered upon final issuance

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install
for
Production Paint Finishers, Inc.

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Authorization

Facility ID: 0819030169
Facility Description: metal coating and allied services
Application Number(s): A0037405, A0037544, A0037608, A0037741
Permit Number: P0104859
Permit Description: Chapter 31 modification fro emissions units K001, K004 and K006 and the initial installation of emissions units K007 and K008.
Permit Type: Initial Installation
Permit Fee: $4,400.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 8/13/2009
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Production Paint Finishers, Inc.
140 Center Street
Bradford, OH 45308-0127

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

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

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

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0104859
Permit Description: Chapter 31 modification fro emissions units K001, K004 and K006 and the initial installation of emissions units K007 and K008.

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

Emissions Unit ID:	**K004**
Company Equipment ID:	Spray Booth 4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K007**
Company Equipment ID:	R001
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Synthetic Minor Units

Emissions Unit ID:	**K001**
Company Equipment ID:	Spray Booths 1 & 2
Superseded Permit Number:	08-04734
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K006**
Company Equipment ID:	Spray Booth 6
Superseded Permit Number:	08-04705
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K008**
Company Equipment ID:	K107 Spray Booth # 7
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 2.a), Severability Clause

(2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements

(3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A. 9., Reporting Requirements

(5) Standard Term and Condition A. 10., Applicability

(6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A. 14., Public Disclosure

(8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A. 16., Fees

(10) Standard Term and Condition A. 17., Permit Transfers

2. Severability Clause

a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Regional Air Pollution Control Agency.

(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Regional Air Pollution Control Agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Regional Air Pollution Control Agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Regional Air Pollution Control Agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

d) The permittee shall submit progress reports to the Regional Air Pollution Control Agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Regional Air Pollution Control Agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Regional Air Pollution Control Agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e.,

postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Regional Air Pollution Control Agency must be notified in writing of any transfer of this permit.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

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.

2. 40 CFR Part 63, Subpart A:

   Emissions units K001, K004, K006, K007, and K008 are subject to the provisions of the General Provisions of the National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63, Subpart A).

   The applicable provisions of 40 CFR Part 63, Subpart A are identified in Table 2 of 40 CFR Part 63, Subpart MMMM and Table 2 of 40 CFR Part 63, Subpart PPPP.

3. 40 CFR Part 63, Subpart MMMM

   Emissions units K001, K004, K006, K007, and K008 are subject to the provisions of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart MMMM).

   a) Applicable Emissions Limitations, Operating Limitations, and Work Practice Limitations:

      The permittee shall comply with the applicable limitations of 40 CFR Parts 63.3880 – 63.3901.

   b) Monitoring and Record Keeping Requirements:

      The permittee shall comply with the applicable monitoring and record keeping requirements of 40 CFR Parts 63.3910 – 63.3981.

   c) Reporting Requirements:

      The permittee shall comply with the applicable reporting requirements of 40 CFR Parts 63.3910 – 63.3981.

   d) Testing Requirements:

      The permittee shall comply with the applicable testing requirements of 40 CFR Parts 63.3910 – 63.3981.

4. 40 CFR Part 63, Subpart PPPP:

   Emissions units K001, K004, K006, K007, and K008 are subject to the provisions of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products (40 CFR Part 63, Subpart PPPP).

   a) Applicable Emissions Limitations, Operating Limitations, and Work Practice Limitations:

      The permittee shall comply with the applicable limitations of 40 CFR Parts 63.4480 – 63.4501.

   b) Monitoring and Record Keeping Requirements:

      The permittee shall comply with the applicable monitoring and record keeping requirements of 40 CFR Parts 63.4510 – 63.4581.

c) Reporting Requirements:

The permittee shall comply with the applicable reporting requirements of 40 CFR Parts 63.4510 – 63.4581.

d) Testing Requirements:

The permittee shall comply with the applicable testing requirements of 40 CFR Parts 63.4510 – 63.4581

5. Predominant Activity Alternative Compliance Option for 40 CFR Part 63 Subpart MMMM and 40 CFR Part 63 Subpart PPPP:

The permittee has the option to comply with either 40 CFR Part 63 Subpart MMMM or 40 CFR Part 63 Subpart PPPP as stated in 40 CFR Part 63.3381(e)(2) of Subpart MMMM and 40 CFR Part 63.4481(e)(2) of Subpart PPPP.

Should the permittee choose the Predominant Activity Alternative Compliance Option, then the permittee must determine the predominant surface coating activity at the facility in order to establish the applicable rule requirements. This option is available to facilities that perform more than one type of surface coating operation. The predominant activity is identified as the surface coating activity that accounts for 90% or more of the permittee's coating operations.

This determination shall be performed annually as stated in 40 CFR Part 63.3381(e)(2)(ii) of Subpart MMMM and 40 CFR Part 63.4481(e)(2)(ii) of Subpart PPPP and shall be submitted to RAPCA by January 31 of each year.

C. Emissions Unit Terms and Conditions

1. K004, Spray Booth 4

Operations, Property and/or Equipment Description:

Paint spray booth with up to two spray guns and dry filtration that never uses more than 10 gallons of coatings per day

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 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 3745-21-09(U)(2)(e)(iii)	See b)(2)a.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Major New Source Review)	See b)(2)b.
c.	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) shall not exceed 0.551 pounds per hour and 2.4 tons per year from coatings. See b)(2)c.
d.	OAC rule 3745-17-11(C)	See b)(2)c., c)(1) and c)(2).
e.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
f	40 CFR Part 63, Subpart MMMM [40 CFR Part 63.3890(b)(1)]	The organic hazardous air pollutant (HAP) emissions from metal parts and products coating shall be limited to no more than 0.31 kg (2.6 lbs) organic HAP per liter (gallon), during each 12-month compliance period. See Section B.3. and B.5.
g.	40 CFR Part 63, Subpart PPPP [40 CFR Part 63.4490(b)(1)]	The organic HAP emissions from plastic parts and products coating shall not exceed 0.16 kilogram (0.16 lb) per kilogram (lb) coating solids used during each 12-month compliance period. See Section B.4. and B.5.

h.	40 CFR Part 63, Subpart A	Table 2 of 40 CFR Part 63, Subpart MMMM and Table 2 of 40 CFR Part 63, Subpart PPPP identify the applicable provisions of 40 CFR Part 63.1-15.

(2) Additional Terms and Conditions

a. The permittee shall not employ more than ten gallons of coating per day in the paint spray booth.

b. This emissions unit has been in operation for more than 12-months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions upon issuance of this permit. The VOC emissions from this emissions unit shall not exceed 8.2 tons per year, based upon a rolling, 12-month summation of the monthly VOC emissions, based on usage.

c. 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, and 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, at which time the requirements of OAC rule 3745-17-11(B) shall cease to apply.

c) Operational Restrictions

(1) 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 system shall be employed during all periods of coating application to control particulate emissions.

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

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification of each coating employed;

b. the volume, in gallons, of each coating employed; and

c. the total volume, in gallons, of all of the coatings employed.

(2) The permittee shall collect and record the following information each month for the purpose of determining the monthly and rolling 12-month VOC emissions for this emissions unit:

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

b. the volume, in gallons, of each coating, thinner and cleanup material employed;

c. the maximum VOC content for each coating, thinner and cleanup material employed, in pounds per gallon;

d. the total VOC emissions from all coatings thinners and cleanup materials employed, in tons [the summation of d)(2)b. times d)(2)c. for all coatings, thinners and clean up materials, divided by 2,000 pounds per ton]; and

e. the rolling, 12-month summation of the total VOC emissions, in tons (this shall include the information for the current month and the preceding eleven calendar months).

(3) The permittee shall collect and record the following information each month for the purpose of determining annual organic compound (OC) emissions as required for the Title V Fee Emissions Report (FER):

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

b. the OC content of each coating, thinner and cleanup material employed, in pounds per gallon;

c. the volume, in gallons, of each coating, thinner and cleanup material employed; and

d. the total OC emissions from all coatings, thinners and cleanup materials employed, in tons [the summation of d)(3)b. times d)(3)c. for all coatings, thinners and cleanup materials, divided by 2000 pounds per ton].

(4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter system, 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 Ohio EPA or RAPCA upon request.

(5) The permittee shall conduct periodic inspections of the dry particulate filter system 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. The permittee shall maintain a copy of the manufacturer=s recommended inspection frequency and it shall be made available to the Ohio EPA or RAPCA upon request.

(6) 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 system 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.

(7) 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 problem identified and the date it was corrected;

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

d. the name of the 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 Ohio EPA or RAPCA upon request.

(8) The permittee shall maintain records that document any time periods when the dry particulate filter system was not in service when the emissions unit was in operation, as well as a record of all operations during which the dry particulate filter system 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 or RAPCA upon request.

e) Reporting Requirements

(1) The permittee shall notify RAPCA in writing of any daily record showing that the coating line employs more than 10 gallons of coating per day. The notification shall include a copy of such record and shall be sent to the RAPCA within 30 days after the exceedance occurs.

(2) The permittee shall submit quarterly deviation reports that identify all exceedances of the rolling 12-month VOC emission limitation. The quarterly deviation reports shall be submitted to RAPCA in accordance with the Standard Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

(3) The permittee shall submit annual reports that specify the total OC and VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual FER.

(4) The permittee shall notify RAPCA in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to RAPCA within 30 days after the event occurs.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) and b)(2) shall be determined in accordance with the following method(s):

a. Emission Limitation –

The permittee shall not employ more than ten gallons of coating per day in the paint spray booth.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(1).

b. Emission Limitation –

The VOC emissions from this emissions unit shall not exceed 8.2 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(2).

c. Emission Limitation -

0.551 lb of PE per hour

Applicable Compliance Method -

To determine the worst case PE rate, the following equation shall be used:

E = maximum coating solids usage rate, in pounds per hour x (1-TE) x (1-CE)

where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

If requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

d. Emission Limitation -

2.41 tons of PE per year

Applicable Compliance Method -

Compliance with the lb/hr emission limit demonstrates compliance with this limit because this limit is based on the lb/hr limit and 8,760 hours per year of operation.

e. Emission Limitation -

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

Applicable Compliance Method -

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

g) Miscellaneous Requirements

(1) The terms and conditions of this PTI supersede those identified in PTI 08-2315 issued January 15, 1992.

2. K007 Caulk and Sealant

Operations, Property and/or Equipment Description:

Caulk and sealant application throughout the facility

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 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. and b.
b.	OAC rule 3745-21-09(U)(1)(c)	See b)(2)c.
c.	OAC rule 3745-21-09(U)(1)(d)	See b)(2)d.
d.	40 CFR Part 63, Subpart MMMM [40 CFR Part 63.3890(b)(1)]	The organic hazardous air pollutant (HAP) emissions from metal parts and products coating shall be limited to no more than 0.31 kg (2.6 lbs) organic HAP per liter (gallon), during each 12-month compliance period. See Section B.3. and B.5.
e.	40 CFR Part 63, Subpart PPPP [40 CFR Part 63.4490(b)(1)]	The organic HAP emissions from plastic parts and products coating shall not exceed 0.16 kilogram (0.16 lb) per kilogram (lb) coating solids used during each 12-month compliance period. See Section B.4. and B.5.
f.	40 CFR Part 63, Subpart A	Table 2 of 40 CFR Part 63, Subpart MMMM and Table 2 of 40 CFR Part 63, Subpart PPPP identify the applicable provisions of 40 CFR Part 63. 1-15.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the (volatile organic compound) VOC emissions from this air contaminant source because the potential to emit for VOC of 8.90 tons per year (TPY) is less than 10.0 TPY, taking into account the federally enforceable limit of 3.5 pounds of VOC/gallon (excluding water and exempt

solvents) from OAC rules 3745-21-09(U)(1)(c) and (U)(1)(d), the maximum application rate of 0.58 gallon/hour, and 8,760 hours of operation/year.

b. The coatings applied in this emissions unit consist of caulks and sealants applied manually using caulking guns. The caulks and sealants are applied throughout the facility, and the VOC emissions are not directed to any vent or stack.

c. The VOC content of each coating applied in this emissions unit that is air dried at less than 200 degrees Fahrenheit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average.

d. The VOC content of each extreme performance coating applied in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee, having chosen to demonstrate compliance by means of a daily volume-weighted average VOC content, shall collect and record the following information each day for the emissions unit:

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

b. the mass of VOC per volume of coating (excluding water and exempt solvents) and the volume, in gallons (excluding water and exempt solvents), of each coating, as applied; and

c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$, as follows:

$$(C_{voc,2})_A = \frac{\sum_i^n C_{voc,2i}\ L_{ci}\ (V_{si} + V_{voci})}{\sum_i^n L_{ci}\ (V_{si} + V_{voci})}$$

where:

$(C_{VOC,2})_A$ = daily volume-weighted average VOC content of all coatings, as applied.

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

$$C_{voc,2} = \frac{(D_c)\ (W_{voc})}{V_s + V_{voc}}$$

where:

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

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

$$W_{voc} = W_{vm} - W_w - W_{ES}$$

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

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

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

$$V_{voc} = V_{vm} - V_w - V_{ES}$$

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

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

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

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period At@.

L_C = liquid volume of coating employed during time period At@, in gallons of coating.

M_C = mass of coating employed during the time period At@, in pounds of coating.

i = subscript denoting a specific coating employed during time period At@.

n = total number of coatings employed during time period At@.

t = time period specified for the weighted average VOC content.

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

a. the name and identification of each coating employed;

b. the VOC content of each coating, in pounds of VOC per gallon of coating, as applied;

c. the volume, in gallons, of each coating applied; and

d. the total VOC emissions, in tons [the summation of d)(2)b. times d)(2)c. for all coatings employed, divided by 2,000 pounds per ton].

(3) The permittee shall collect and record the following information each month for the purpose of determining annual organic compound (OC) emissions as required for the Title V Fee Emissions Report (FER):

a. the name and identification of each coating employed;

b. the OC content of each coating, in pounds per gallon;

c. the volume, in gallons, of each coating employed; and

d. the total OC emissions from all coatings employed, in tons [the summation of d)(3)b. times d)(3)c. for all coatings employed, divided by 2000 pounds per ton].

e) Reporting Requirements

(1) The permittee shall notify RAPCA in writing of any monthly record showing the use of noncomplying coatings that exceed the emissions limitations of b)(2)c. and b)(2)d. The notification shall include a copy of such record and shall be sent to RAPCA within 45 days following the end of the calendar month.

(2) The permittee shall submit annual reports that specify the total OC and VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual FER.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) and b)(2) shall be determined in accordance with the following method(s):

a. Emission Limitation -

The VOC content of each coating applied in this emissions unit that is air dried at less than 200 degrees Fahrenheit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(1) and manufacturer coating formulation data. If requested, the VOC contents of the coatings shall be determined according to the requirements of U.S. EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

b. Emissions Limitation -

The VOC content of each extreme performance coating applied in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(1). The VOC contents of the coatings shall be determined according to the requirements of U.S. EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group - Synthetic Minor Units: K001, K006, K008

EU ID	Operations, Property and/or Equipment Description
K001	Miscellaneous Metal Parts Coating Line - consisting of overhead conveyor, multi-stage parts washer, natural gas fired dry off oven (P001), two paint booths with water wash control system, six spray guns or rotary atomizers, powder coating line, and 3.5 mmBtu/hr natural gas fired convection bake oven (P002). Coatings applied include extreme performance coatings, coatings that are air dried at less than 200 degrees Fahrenheit and zinc rich primer.
K006	Miscellaneous Metal Parts Coating Line - consisting of overhead conveyor, booth with dry filtration system, four spray guns, and 3.5 mmBtu/hr natural gas fired infrared drying oven. Coatings applied include extreme performance coatings, coatings that are air dried at less than 200 degrees Fahrenheit, and zinc rich primer.
K008	Miscellaneous Metal Parts Coating Line - with dry filtration system, coatings applied include extreme performance coatings, 12 spray guns and 2.8 mmBtu/hr input capacity natural gas-fired air makeup unit. Coatings applied include coatings that are air dried at less than 200 degrees Fahrenheit and zinc rich primer. (K008 replaced emissions unit K005.)

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 the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<u>Emissions Unit K001</u>: The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 147 pounds per hour, excluding cleanup materials. The VOC emissions from this emissions unit shall not exceed 60 tons per year, including cleanup materials, based upon a rolling, 12-month summation of the monthly emissions. <u>Emissions Unit K006</u>: The VOC emissions from this emissions unit shall not exceed 98.0 pounds per hour, excluding cleanup materials.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The VOC emissions from this emissions unit shall not exceed 57.5 tons per year, including cleanup materials, based upon a rolling, 12-month summation of the monthly emissions. <u>Emissions Unit K008</u>: The VOC emissions from this emissions unit shall not exceed 84.0 pounds per hour, excluding cleanup materials. The VOC emissions from this emissions unit shall not exceed 57.5 tons per year, including cleanup materials, based upon a rolling, 12-month summation of the monthly emissions. See b)(2)a. and b)(2)c through b)(2)e. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07, 3745-17-11, 3745-21-09(U) and 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid major New Source Review (NSR))	See b)(2)b.
c.	OAC rule 3745-21-09(U)(1)	The emissions limitations established pursuant to this rule are less stringent than or equivalent to the emission limitations established according to OAC rule 3745-31-05(A)(3). See b)(2)c.
d.	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) from each emissions unit shall not exceed 0.551 pounds per hour and 2.4 tons per year from coatings. See b)(2)g., c)(2) and c)(3).
e.	OAC rule 3745-17-11(C)	See b)(2)g., c)(2) and c)(3).
f.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack serving these emissions units shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
g.	40 CFR Part 63, Subpart MMMM [40 CFR Part 63.3890(b)(1)]	The organic hazardous air pollutant (HAP) emissions from metal parts and products coating shall be limited to no more than 0.31 kg (2.6 lbs) organic HAP

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		per liter (gallon), during each 12-month compliance period. See Section B.3. and B.5.
h.	40 CFR Part 63, Subpart PPPP [40 CFR Part 63.4490(b)(1)]	The organic HAP emissions from plastic parts and products coating shall be limited to no more than 0.16 kilogram (0.16 lb) per kilogram (lb) coating solids used during each 12-month compliance period. See Section B.4. and B.5.
i.	40 CFR Part 63, Subpart A	Table 2 of 40 CFR Part 63, Subpart MMMM and Table 2 of 40 CFR Part 63, Subpart PPPP identify the applicable provisions of 40 CFR Part 63. 1-15.

(2) Additional Terms and Conditions

a. The hourly VOC emissions limitation for each emissions unit was established for PTI purposes to reflect the potential to emit for that emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

b. In order to avoid major NSR permitting requirements, the combined VOC emissions from emissions units K001, K006 and K008 shall not exceed 120 tons per year, based upon a rolling, 12-month summation of the monthly VOC emissions, based on usage. Emissions units K001 and K006 have been in operation for more than 12 months and emissions unit K008 is a replacement for emissions unit K005; as such, the permittee has existing records to generate the rolling, 12-month summations of the emissions upon issuance of this permit.

c. The VOC content of all the coatings applied in each of these emissions units shall not exceed 3.5 pounds of VOC per gallon, <u>excluding</u> water and exempt solvents, as a daily volume weighted average.

d. The VOC content of each of the coating materials listed in the following table shall not be exceeded regardless of the substrate being coated.

Mil-Spec Coating Material	**VOC content, including water and exempt solvents (lbs/gallon)**
Ultra low VOC Top Coat	0.60
Low VOC Top Coat	1.00
Low VOC Epoxy Primer	1.89

e. Upon approval by customers, but no later than January 1, 2010 the use of ultra low VOC top coats shall replace the use of low VOC top coat in all applications where its use has been approved by customers.

f. A Best Available Control Technology (BACT) analysis shall be required for any future permit modifications that involve:

i. An increase in the VOC content of the Mil-Spec Coating Materials listed in b)(2)d.;

ii. An increase in the rolling 12-month VOC emissions limitation for emissions units K001, K006 and K008 combined, specified in b)(2)b.; or

iii. An increase of the individual maximum rolling 12-month VOC emissions limitations for each emissions unit K001, K006 and K008 listed in b)(1)a.

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, and 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, at which time the requirements of OAC rule 3745-17-11(B) shall cease to apply.

c) Operational Restrictions

(1) The combined VOC emissions limitation of 120 tons per year for emissions units K001, K006 and K008 established in b)(2)b is based upon a rolling 12-month summation of monthly VOC usage in the form of coatings, thinners, and cleanup materials, without emissions controls. Emissions units K001 and K006 have been in operation for more than 12-months and emissions unit K008 is a replacement for emissions unit K005; as such, the permittee has existing records to generate the rolling, 12-month summations of VOC usage upon issuance of this permit.

(2) The permittee shall operate and maintain the water wash control system for emissions unit K001 and the dry particulate filter systems for emissions units K006 and K008 in accordance with the manufacturer=s recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The water wash control system for emissions unit K001 and the dry particulate filter systems for emissions units K006 and K008 shall be employed during all periods of coating application to control particulate emissions.

(3) The permittee shall expeditiously repair the water wash control system for emissions unit K001 and the dry particulate filter systems for emissions units K006 and K008 or otherwise return them to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that they are not operating in accordance with these requirements.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee, having chosen to demonstrate compliance by means of a daily volume-weighted average VOC content, shall collect and record the following information each day <u>for each coating line</u>:

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

b. the mass of VOC per volume of coating (excluding water and exempt solvents) and the volume, in gallons, (excluding water and exempt solvents) of each coating, as applied; and

c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$, as follows:

$$(C_{voc,2})_A = \frac{\sum_i^n C_{voc,2i}\ L_{ci}\ (V_{si} + V_{voci})}{\sum_i^n L_{ci}\ (V_{si} + V_{voci})}$$

where:

$(C_{VOC,2})_A$ = daily volume-weighted average VOC content of all coatings, as applied.

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

$$C_{voc,2} = \frac{(D_c)\ (W_{voc})}{V_s + V_{voc}}$$

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

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

$$W_{voc} = W_{vm} - W_w - W_{ES}$$

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

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

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

$$\mathrm{V}_{voc} = \mathrm{V}_{vm} - \mathrm{V}_w - \mathrm{V}_{ES}$$

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

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

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

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period At@.

L_C = liquid volume of coating employed during time period At@, in gallons of coating.

M_C = mass of coating employed during the time period At@, in pounds of coating.

i = subscript denoting a specific coating employed during time period At@.

n = total number of coatings employed during time period At@.

t = time period specified for the weighted average VOC content.

(2) The permittee, having chosen to demonstrate compliance for each of the mil-spec coatings in b)(2)d. through the use of compliant coatings, shall collect and record the following information each month <u>for each of the mil-spec coatings</u> employed in each line:

a. The name and identification of each coating as purchased; and

b. the mass of VOC per volume (pounds/gallon) of each coating, including water and exempt solvents, as purchased, calculated as follows for $C_{VOC,2}$:

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

where

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

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

$$W_{voc} = W_{vm} - W_w - W_{ES}$$

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

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

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

$$V_{voc} = V_{vm} - V_w - V_{ES}$$

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

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

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

(3) The permittee shall collect and record the following information each month for emissions units K001, K006 and K008 for the purposes of determining material usage and VOC emissions. This information shall be maintained separately for each emissions unit and also combined for emissions units K001, K006 and K008:

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

b. the VOC content of each coating, thinner and cleanup material employed, in pounds of VOC per gallon, including water and exempt solvents;

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

d. the total VOC emissions from all coatings, thinners, and cleanup materials employed, in tons, using the following equation:

Emissions (tons/month) = $\sum_{i=1}^{n} Vj_i Gj_i / 2000$

n = number of thinners, cleanup materials and coatings

Vj_i = VOC content, lbs/gallon including water and exempt solvents, for each thinner, cleanup material and coating

Gj_i = volume in gallons, including water and exempt solvents, for each thinner, cleanup material and coating; and

e. the rolling, 12-month summation of the total VOC emissions, in tons (this shall include the information for the current month and the preceding eleven calendar months).

(4) The permittee shall collect and record the following information for the purpose of determining annual organic compound (OC) emissions as required for the Title V Fee Emissions Report (FER). This information shall be maintained separately for each emissions unit.

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

b. the OC content of each coating, thinner, and cleanup material employed, in pounds per gallon;

c. the volume, in gallons, of each coating, thinner, and cleanup material employed; and

d. the total OC emissions from all coatings, thinners, and cleanup materials employed, in tons, using the following equation:

Emissions (tons/year) = $\sum_{i=1}^{n} Vj_i Gj_i / 2000$

n = number of thinners, cleanup materials and coatings

Vj_i = OC content, in lbs/gallon, for each thinner, cleanup material and coating

Gj_i = volume, in gallons, for each thinner, cleanup material and coating

(5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the water wash control system for emissions unit

K001 and for the dry particulate filter systems for emissions units K006 and K008, 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 Ohio EPA or RAPCA upon request.

(6) The permittee shall conduct periodic inspections of the water wash control system for emissions unit K001 and the dry particulate filter systems for emissions units K006 and K008 to determine whether they are 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 or RAPCA upon request.

(7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the water wash control system for emissions unit K001 and the dry particulate filter systems for emissions units K006 and K008 while the emissions units are shut down and perform any needed maintenance and repair to ensure that they are operated in accordance with the manufacturer's recommendations.

(8) The permittee shall document each inspection (periodic and annual) of the water wash control system for emissions unit K001 and the dry particulate filter systems for emissions units K006 and K008 and shall maintain the following information:

a. the date of each inspection;

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

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

d. the name of the 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 Ohio EPA or RAPCA upon request.

(9) The permittee shall maintain records that document any time periods when the water wash control system for emissions unit K001 and the dry particulate filter systems for emissions units K006 and K008 were not in service when the emissions units were in operation, as well as, a record of all operations during which the water wash control system and the dry particulate filter systems were 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 or RAPCA upon request.

e) Reporting Requirements

(1) The permittee shall notify RAPCA in writing of each daily record showing a daily volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to RAPCA within 30 days after the event occurs.

(2) The permittee shall notify RAPCA in writing of any monthly record showing the use of non-complying coatings that exceed the VOC content limitations specified in b)(2)d. The notification shall include a copy of such record and shall be sent to RAPCA within 30 days following the end of the calendar month.

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

a. all exceedances of the individual rolling 12-month VOC emission limitations for K001, K006 and K008 in b)(1)a.; and

b. all exceedances of the combined rolling, 12-month VOC emission limitation for K001, K006 and K008 in b)(2)b.

The quarterly deviation reports shall be submitted to RAPCA in accordance with the Standard Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

(4) The permittee shall submit annual reports for each calendar year that specify:

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

b. the total VOC emissions from emissions units K001, K006 and K008 individually;

c. the total VOC emissions from emissions units K001, K006 and K008 combined;

d. the total OC emissions from emissions units K001, K006 and K008 individually; and

e. the total OC emissions from emissions units K001, K006 and K008 combined.

The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied, in part, by including and identifying the specific emission data for these emissions units in the annual FER.

(5) The permittee shall notify RAPCA in writing of any record showing that the dry filtration systems or water wash control system were not in service when emissions units K001, K006 and K008 were in operation. The notification shall include a copy of such record and shall be sent to RAPCA within 30 days after the event occurs.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) and b)(2) and operational restrictions in c)(1) shall be determined in accordance with the following method(s):

a. Emission Limitation –

The VOC emissions from emissions unit K001 shall not exceed 147 pounds per hour, excluding cleanup materials.

Applicable Compliance Method –

This emissions limitation is the potential to emit for this emissions unit and was based upon the maximum application rate of 7 gallons/hour/spray gun, 6 spray guns, and compliance with b)(2)c. (3.5 lbs of VOC/gallon, excluding water and exempt solvents, as a daily volume weighted average).

b. Emission Limitation –

The VOC emissions from emissions unit K001 shall not exceed 60 tons per year, including cleanup materials, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(3) and shall be the sum of the VOC emissions for the previous 12-months.

c. Emission Limitation –

The VOC emissions from emissions unit K006 shall not exceed 98.0 pounds per hour, excluding cleanup materials.

Applicable Compliance Method –

This emissions limitation is the potential to emit for this emissions unit and was based upon the maximum application rate of 7 gallons/hour/spray gun, 4 spray guns, and compliance with b)(2)c. (3.5 lbs of VOC/gallon, excluding water and exempt solvents, as a daily volume weighted average).

d. Emission Limitation –

The VOC emissions from emissions unit K006 shall not exceed 57.5 tons per year, including cleanup materials, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(3) and shall be the sum of the VOC emissions for the previous 12-months.

e. Emission Limitation –

The VOC emissions from emissions unit K008 shall not exceed 84.0 pounds per hour, excluding cleanup materials.

Applicable Compliance Method –

This emissions limitation is the potential to emit for this emissions unit and was based upon the maximum application rate of 2 gallons/hour/spray gun, 12 spray guns, and compliance with b)(2)c. (3.5 lbs of VOC/gallon, excluding water and exempt solvents, as a daily volume weighted average).

f. Emission Limitation –

The VOC emissions from emissions unit K006 shall not exceed 57.5 tons per year, including cleanup materials, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(3) and shall be the sum of the VOC emissions for the previous 12-months.

g. Emission Limitation –

The combined VOC emissions from emissions units K001, K006 and K008 shall not exceed 120 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(2) and shall be the sum of the VOC emissions for the previous 12-months.

h. Emissions Limitation –

The VOC contents of the coating materials listed in the following table shall not be exceeded regardless of the substrate being coated.

Mil Spec Coating Material	VOC content, including water and exempt solvents (lbs/gallon)
Ultra low VOC Top Coat	0.60
Low VOC Top Coat	1.00
Low VOC Epoxy Primer	1.89

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(2) and manufacturer coating formulation data. If requested, the VOC content shall be determined according to the requirements of U.S. EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

i. Emission Limitation –

The VOC content of all coatings applied in each emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, <u>excluding</u> water and exempt solvents, as a daily volume-weighted average.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(1) and manufacturer coating formulation data. If requested, the VOC content shall be determined according to the requirements of U.S. EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

j. Emission Limitation -

0.551 lb of PE per hour

Applicable Compliance Method -

To determine the worst case PE rate, the following equation shall be used:

E = maximum coating solids usage rate, in pounds per hour, x (1-TE) x (1-CE)

where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

If requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

k. Emission Limitation -

2.41 tons of PE per year

Applicable Compliance Method -

Compliance with the lb/hr emission limit demonstrates compliance with this limit because this limit is based on the lb/hr limit and 8,760 hours per year of operation.

l. Emission Limitation -

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

Applicable Compliance Method -

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

g) Miscellaneous Requirements

(1) The terms and conditions of this PTI supersede those identified in PTI 08-04734 issued March 30, 2006 for emissions unit K001.

(2) The terms and conditions of this PTI supersede those identified in PTI 08-04705 issued October 15, 2005 for emissions unit K006.