



State of Ohio Environmental Protection Agency

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

8/14/2009

CARL WILSON
GALION GODWIN TRUCK BODY CO LLC
PO BOX 208
WINESBURG, OH 44690

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0238000065
Permit Number: P0084669
Permit Type: Renewal
County: Holmes

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:

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

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

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

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

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

Sincerely,


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

Cc: Ohio EPA-NEDO

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



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

FINAL

**Air Pollution Permit-to-Install and Operate
for
GALION GODWIN TRUCK BODY CO LLC**

Facility ID: 0238000065
Permit Number: P0084669
Permit Type: Renewal
Issued: 8/14/2009
Effective: 8/14/2009
Expiration: 8/14/2019



Air Pollution Permit-to-Install and Operate
for
GALION GODWIN TRUCK BODY CO LLC

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Final Permit-to-Install and Operate
Permit Number: P0084669
Facility ID: 0238000065
Effective Date: 8/14/2009

Authorization

Facility ID: 0238000065
Application Number(s): A0015236, A0037869
Permit Number: P0084669
Permit Description: Renewal PTIO for emissions units P003, P004, P005, and R004.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 8/14/2009
Effective Date: 8/14/2009
Expiration Date: 8/14/2019
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

GALION GODWIN TRUCK BODY CO LLC
7415 PEABODY-KENT RD
WINESBURG, OH 44690

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, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0084669
Permit Description: Renewal PTIO for emissions units P003, P004, P005, and R004.

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

- | | |
|-----------------------------------|----------------------|
| Emissions Unit ID: | P003 |
| Company Equipment ID: | Grit Blast #2 |
| Superseded Permit Number: | 02-14136 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P004 |
| Company Equipment ID: | wheelabrator |
| Superseded Permit Number: | 02-22441 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P005 |
| Company Equipment ID: | plasma cutting table |
| Superseded Permit Number: | 02-22441 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | R004 |
| Company Equipment ID: | Spray Booth #3 |
| Superseded Permit Number: | 02-2223 |
| General Permit Category and Type: | Not Applicable |



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0084669

Facility ID: 0238000065

Effective Date: 8/14/2009

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, Northeast 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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0084669

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Effective Date: 8/14/2009

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

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

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

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

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Effective Date: 8/14/2009

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0084669

Facility ID: 0238000065

Effective Date: 8/14/2009

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0084669

Facility ID: 0238000065

Effective Date: 8/14/2009

C. Emissions Unit Terms and Conditions



1. P003, Grit Blast #2

Operations, Property and/or Equipment Description:

Grit blast booth #2 controlled by a 22,000 acfm, return air Torit dust collection system.

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

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

a. None.

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

a. 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 3745-17-07(A)(1)	See b)(2)a.
b.	OAC rule 3745-17-11	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3) (PTI 02-14136)	See b)(2)c and b)(2)d.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

b. The uncontrolled mass rate of PE from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply pursuant to OAC rule 3745-17-11(A)(2)(b)(ii).

c. Particulate emissions generated from this emissions unit shall not exceed 0.01 grain per dry standard cubic foot, 0.943 pound per hour, and 4.13 tons per year.

d. There shall be no visible particulate emissions from the return air outlet of the dust collector.



c) Operational Restrictions

- (1) The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer=s recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date the corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.



- (2) The acceptable range for the pressure drop across the baghouse is 2.0 to 4.0 inches of water.
 - (3) This range on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the range for the pressure drop based upon information obtained during future particulate emissions tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.
- e) Reporting Requirements
- (1) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this emissions unit:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in Aa@ (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in Aa@ where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in Aa@ where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
 - (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 PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with emission limitations in sections b)(1) and b)(2) above shall be determined in accordance with the following methods:
 - a. Emission Limitation:

There shall be no visible particulate emissions from the return air outlet of the dust collector.



Applicable Compliance Method:

Compliance shall be demonstrated through visible particulate emission observations performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 22.

b. Emission Limitation:

Particulate emissions generated from this emissions unit shall not exceed 0.01 grain per dry standard cubic foot and 0.943 pound per hour.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emission Limitation:

Particulate emissions generated from this emissions unit shall not exceed 4.13 tons per year.

Applicable Compliance Method:

The tons per year limitation was developed by multiplying the pound per hour limitation (0.943 lb/hr) by the maximum operating schedule of 8,760 hours per year, and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

g) Miscellaneous Requirements

(1) None.



2. P004, wheelabrator

Operations, Property and/or Equipment Description:

12 wheel monorail abrasive cleaning system to prepare steel prior to assembly of truck bodies. Emissions are controlled by a 12,000 cfm cartridge dust collector.

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

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

a. None.

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

a. 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 3745-17-07(A)(1)	See b)(2)a.
b.	OAC rule 3745-17-11	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3) (PTI 02-22441)	See b)(2)c and b)(2)d.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

b. The uncontrolled mass rate of PE from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply pursuant to OAC rule 3745-17-11(A)(2)(b)(ii).

c. Particulate emissions generated from this emissions unit shall not exceed 0.044 pound per hour and 0.19 ton per year.



- d. Visible particulate emissions from the outlet of the dust collector shall not exceed 0% opacity as a 6-minute average, except for one 6-minute period per hour.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer=s recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date the corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.



Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (2) The acceptable range for the pressure drop across the dust collector is 2.0 to 4.0 inches of water.
- (3) This range on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the range for the pressure drop based upon information obtained during future particulate emissions tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

- (1) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this emissions unit:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in Aa@ (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in Aa@ where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in Aa@ where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (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 PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with emission limitations in sections b)(1) and b)(2) above shall be determined in accordance with the following methods:



a. Emission Limitation:

Visible particulate emissions from the outlet of the dust collector shall not exceed 0% opacity as a 6-minute average, except for one 6-minute period per hour.

Applicable Compliance Method:

Compliance shall be demonstrated through visible particulate emission observations performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitation:

Particulate emissions generated from this emissions unit shall not exceed 0.044 pound per hour.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emission Limitation:

Particulate emissions generated from this emissions unit shall not exceed 0.19 ton per year.

Applicable Compliance Method:

The tons per year limitation was developed by multiplying the pound per hour limitation (0.044 lb/hr) by the maximum operating schedule of 8,760 hours per year, and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

g) Miscellaneous Requirements

- (1) None.



3. P005, plasma cutting table

Operations, Property and/or Equipment Description:

plasma cutting table to fabricate steel truck bodies. Emissions are controlled by parallel dust collectors, 3,850 cfm and 5,500 cfm.

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

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

a. None.

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

a. 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 3745-17-07(A)(1)	See b)(2)a.
b.	OAC rule 3745-17-11	See b)(2)b.
c.	OAC rule 3745-31-05(E)	See b)(2)c.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

b. The uncontrolled mass rate of PE from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply pursuant to OAC rule 3745-17-11(A)(2)(b)(ii).

c. Permit to Install 02-22441 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):



- i. use of a 3,850 cfm Ply-movement dust collector and a 5,500 cfm FSX dust collector to control particulate emissions; and
 - ii. voluntary restrictions of particulate emissions to no more than 0.4 ton per year.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer=s recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date the corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and



- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (2) The acceptable range for the pressure drop across the 3,850 cfm Ply-movement dust collector is 2.0 to 6.0 inches of water, and the 5,500 cfm FSX dust collector is 2.0 to 6.0 inches of water.
- (3) This range on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the range for the pressure drop based upon information obtained during future particulate emissions tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

- (1) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this emissions unit:
- a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in Aa@ (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in Aa@ where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in Aa@ where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (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 PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.



f) Testing Requirements

(1) Compliance with emission limitation in section b)(2) above shall be determined in accordance with the following method:

a. Emission Limitation:

0.40 ton per year of particulate emissions

Applicable Compliance Method:

Compliance shall be determined in accordance with the following:

$$PE = (U_{PE})(1 - CE)(HRS)(\text{ton}/2000 \text{ lbs})$$

where:

PE = Actual annual particulate emission rate, in ton per year;

U_{PE} = 4.4 lbs/hr = uncontrolled particulate emission rate, in pounds per hour, supplied by the facility based upon the emissions from an identical unit at a sister company;

CE = 0.98 = overall control efficiency for both dust collectors; and

HRS = actual operating hours, in hours per year.

g) Miscellaneous Requirements

(1) None.



4. R004, Spray Booth #3

Operations, Property and/or Equipment Description:

JBI model T-30-WPDT-S paint booth, 19x18x30, with two spray guns for the coating of metal dump bodies. Coatings are air dried.

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

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

a. d)(3), d)(4), d)(5) and e)(2)

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

a. 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) (PTI 02-12223)	8.75 pounds per hour, 119.9 pounds per day and 21.88 tons per year of VOC emissions from the coating operation 0.13 ton per year of VOC emissions from the clean up material See b)(2)a.
b.	OAC rule 3745-21-09(U)(1)(d)	See b)(2)b.
c.	OAC rule 3745-17-11(C)	See c)(1), d)(6), d)(7), d)(8), d)(9), and d)(10).

(2) Additional Terms and Conditions

a. In the PTI 02-12223 application, the permittee has stated that the shop has the size and space to fabricate and coat only 2,500 steel bodies per year, which limits annual coating usage to 12,500 gallons per year (5 gallons per unit). This "inherent physical limitation" in production capacity limits this coating line's potential to emit to the above listed 22.01 tons VOC per year.



- b. Coatings applied in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.
- c) Operational Restrictions
 - (1) All exhaust from this emissions unit shall pass through the dry filters whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for this emissions unit and shall maintain the information at the facility for a period of three years:

- a. the name and identification number of each coating, as applied;
- b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

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

where:

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

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

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

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

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

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

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

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

V_W = volume fraction of water in coating, in gallon of water per gallon of coating;
and

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

If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

- c. the number of gallons of each coating applied, "CT", in gallons per day;
- d. the actual hours of operation of this emissions unit, "OH", in hours per day;



- e. the total VOC emissions, in pounds per day, from all coatings employed, "TCVOC", and shall be calculated as follows:

$$\text{TCVOC} = (C_{\text{VOC},2})(\text{CT}); \text{ and}$$

- f. the average hourly VOC emissions, in pounds per hour, from all coatings employed, "THCVOC", and shall be calculated as follows:

$$\text{THCVOC} = (\text{TCVOC})/(\text{OH}).$$

- (2) The permittee shall collect and record the following information monthly for the purpose of determining the annual VOC emissions from cleanup material applied to this emissions unit:

- a. the name and identification of each cleanup material employed;
- b. the VOC content of each cleanup material, in pounds per gallon;
- c. the number of gallons of each cleanup material employed; and
- d. the total VOC emission rate from all cleanup materials, in pounds or tons, i.e., the summation of the products of "e" times "f" for all cleanup materials employed.

- (3) The permit to install and operate for this emissions units was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground_level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground_Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological



Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Pollutant: 2-Heptanone (methyl n-amyl ketone)

TLV (ug/m3): 233.4969

Maximum Hourly Emission Rate (lbs/hr): 8.75 lb/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 233.5

MAGLC (ug/m3): 5,559.45

The permittee, has demonstrated that emissions of 2-haptanone (methyl n-amyl ketone) from this emissions unit are calculated to be less than eighty percent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

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



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

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

The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

- (6) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the overspray filters with any modifications deemed necessary by the permittee during the time period in which the overspray filters are utilized.
- (7) The permittee shall operate the overspray filters in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.



- (8) The permittee shall conduct periodic inspections of the overspray filters to determine whether the filters are 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 overspray filters, 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 overspray filters while the emissions unit is shut down and perform any needed maintenance and repair for the overspray filters to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
- (9) The permittee shall document each inspection of overspray filters 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.
- (10) In the event that the overspray filters are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the overspray filters shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the overspray filters are not operating in accordance with such requirements.

e) Reporting Requirements

- (1) The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any record showing the use of non-complying coatings. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Northeast District Office) within 30 days following the end of the calendar month.
- (2) The permittee shall also submit annual reports to the Ohio EPA, Northeast District Office, documenting any changes made to a parameter or value used in the dispersion model (including the air toxic compounds emitted and the emission rate), that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect.
- (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 PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) and b)(2) above shall be determined in accordance with the following methods:



- a. Emission Limitation:

3.5 pounds VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1)b above.
- b. Emissions Limitation:

8.75 pounds VOC per hour from coatings applied

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1)f above.
- c. Emission Limitation:

119.9 pounds VOC per day from coatings applied

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1)e above.
- d. Emissions Limitation:

21.88 tons VOC per year from coatings applied

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) and shall be the sum of the daily VOC emissions from coatings applied for the calendar year.
- e. Emissions Limitation:

0.13 ton per year of VOC emissions from cleanup material

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2) and shall be the sum of the monthly VOC emissions from cleanup materials applied for the calendar year.

g) Miscellaneous Requirements

- (1) None