State of Ohio Environmental Protection Agency

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Certified Mail

8/18/2009

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

James DiLella
LEATHER RESOURCE OF AMERICA, INC.
494 East Main Rd
Conneaut, OH 44030

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0204020430
Permit Number: P0104117
Permit Type: OAC Chapter 3745-31 Modification
County: Ashtabula

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

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

Cc: Ohio EPA-NEDO

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

Air Pollution Permit-to-Install and Operate
for
LEATHER RESOURCE OF AMERICA, INC.

Facility ID: 0204020430
Permit Number: P0104117
Permit Type: OAC Chapter 3745-31 Modification
Issued: 8/18/2009
Effective: 8/18/2009
Expiration: 8/18/2014

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
LEATHER RESOURCE OF AMERICA, INC.

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Authorization

Facility ID: 0204020430
Application Number(s): A0036338, A0037411
Permit Number: P0104117
Permit Description: Chapter 31 modification FEPTIO for spray booth nos. 1-3 to increase HAP emissions limits
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $2,100.00
Issue Date: 8/18/2009
Effective Date: 8/18/2009
Expiration Date: 8/18/2014
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

LEATHER RESOURCE OF AMERICA, INC.
494 EAST MAIN RD
CONNEAUT, OH 44030

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: P0104117
Permit Description: Chapter 31 modification FEPTIO for spray booth nos. 1-3 to increase HAP emissions limits

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

Group Name: Spray booths to coat leather

Emissions Unit ID:	**R001**
Company Equipment ID:	Binks 12 gun spray/coating booth with IR drying oven
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R002**
Company Equipment ID:	Binks 12 gun spray/coating booth with IR drying oven
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R003**
Company Equipment ID:	Binks 12 gun spray/coating booth with IR drying oven
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) B.2.a) through B.2.c)

2. Federally Enforceable Permit to Install and Operate P0104117 for this air contaminant source takes into account the following voluntary restrictions, regarding the emissions units specified in 3., as proposed by the permittee for the purpose of avoiding New Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations requirements under 40 CFR Part 63, Subpart TTTT, and as avoiding Title V requirements under OAC rules 3745-77-02 through 3745-77-10:

   a) The total emissions of volatile organic compounds (VOCs) from the emissions units, specified in 3., shall not exceed 45.0 tons/year, based on a rolling 12-month summation, and shall be achieved by employing the operational restrictions, specified in 4.within this permit for the emissions units specified in 3.

   b) The total emissions of each single hazardous air pollutant (HAP) from the emissions units, specified in 3., shall not exceed 6.0 tons/year, based on a rolling 12-month summation, and shall be achieved by employing the operational restrictions, specified in 4.within this permit for the emissions units specified in 3.

   c) The total emissions of combined HAPs from the emissions units, specified in 3., shall not exceed 9.9 tons/year, based on a rolling 12-month summation, and shall be achieved by employing the operational restrictions, specified in 4.within this permit for the emissions units specified in 3.

3. Voluntary restrictions to limit potential facility-wide emissions of VOCs, single HAPs and combined HAPs by material usage restrictions, include the following emissions units:

   a) R001 - Spray coating machine no. 1 to coat leather with a paint filter to control particulate emissions and with an infra-red drying oven fired by twelve 0.1 mmBtu/hr natural gas burners;

   b) R002 - Spray coating machine no. 2 to coat leather with a paint filter to control particulate emissions and with an infra-red drying oven fired by twelve 0.1 mmBtu/hr natural gas burners;

   c) R003 - Spray coating machine no. 3 to coat leather with a paint filter to control particulate emissions and with an infra-red drying oven fired by twelve 0.1 mmBtu/hr natural gas burners;

   d) R005 – Manual roll coating operation no. 2 of leather where coating exhausts are vented to SM #3 egress, and where air drying exhausts are vented to SM #3 dryer egress;

   e) Manual roll coating operation no. 1 of leather, a deminimis emissions unit; and

f) Any new operation that has the potential to emit VOCs or HAPs.

4. Operational Restrictions

a) The maximum annual coatings and cleanup material(s) usage for the emissions units specified in 3. shall not exceed 145,161 gallons based upon a rolling, 12-month summation of the materials usage rates.

5. Monitoring and/or Record Keeping Requirements

a) The permittee shall maintain monthly records of the following information for the emissions units identified in 3.:

(1) the rolling, 12-month VOC emissions, in tons;

(2) the rolling, 12-month single HAP emissions for each HAP, in tons; and

(3) the rolling, 12-month combined HAP emissions, in tons.

6. Reporting Requirements

a) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

(1) each month during which exceedances of the rolling, 12-month emissions limitation(s) on VOCs, single HAPs and combined HAPs from the emissions units specified in 3. exceeded 45.0 tons of VOCs, 6.0 tons of each single HAP and 9.9 tons combined HAPs;

(2) for each deviation of the VOCs, single HAPs or the combined HAPs emissions limit(s), the actual rolling, 12-month emissions of VOCs, single HAPs and combined HAPs, in tons; and

(3) all exceedances of the rolling, 12-month limitation on material(s) usage.

These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit. If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

7. Testing Requirements

a) Emission Limitation(s):

45.0 tons/year of VOCs, based on a rolling 12-month summation of the emissions from the emissions units specified in 3.;

6.0 tons/year of each single HAP, based on a rolling 12-month summation of the emissions from the emissions units specified in 3.; and

9.9 tons/year of combined HAPs, based on a rolling 12-month summation of the emissions from the emissions units specified in 3.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in 5.

8. Miscellaneous Requirements

a) None.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Spray booths to coat leather: R001, R002, R003,

EU ID	Operations, Property and/or Equipment Description
R001	Spray coating machine no. 1 to coat leather with a paint filter to control particulate emissions and with an infra-red drying oven fired by twelve 0.1 mmBtu/hr natural gas burners
R002	Spray coating machine no. 2 to coat leather with a paint filter to control particulate emissions and with an infra-red drying oven fired by twelve 0.1 mmBtu/hr natural gas burners
R003	Spray coating machine no. 3 to coat leather with a paint filter to control particulate emissions and with an infra-red drying oven fired by twelve 0.1 mmBtu/hr natural gas burners

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

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

a. b)(2)(b), b)(2)(c), c)(1), c)(2), d)(1) through d)(5) and e)(1)(a)ii. for coating overspray control; and

b. d)(8) through d)(11) and e)(2) for Toxic Air Contaminants requirements.

(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)	Visible particulate emissions (PE) from any stack serving any of the above specified emissions units shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-11(B)(1)	The PE rate from each spray coating operation shall not exceed 3.92 lbs/hr. See b)(2)a.
c.	OAC rule 3745-17-11(C)	See b)(2)b., b)(2)c., c)(1) and c)(2).
d.	OAC rule 3745-21-07(G)(2)	Exempt, see b)(2)d. through b)(2)f.
e.	OAC rule 3745-31-05(A)(3)	The organic compound emissions (OC) from coatings and cleanup materials usage shall not

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed 650.4 lbs/day and 45.0 tons/year from each emissions unit. The volatile organic compound (VOC) emissions from coatings and cleanup materials usage shall not exceed 650.4 lbs/day from each emissions unit. See b)(2)d.
f.	OAC rule 3745-31-05(D)(1)(b) – voluntary restriction to avoid Title V and MACT rule requirements	See B.2. through B.7.

(2) Additional Terms and Conditions

a. The allowable, hourly PE rate is based on Table I in OAC rule 3745-17-11 when the maximum process weight rate is 1,870 lbs/hr.

b. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

c. The permittee shall operate the dry particulate filter system, associated with an emissions unit, whenever the emissions unit is in operation.

d. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in any of the specified emissions units is prohibited.

e. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio=s State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(2)d., d)(6)c., and e)(1)a.iii.

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 shall be employed during all periods of coating application to control particulate emissions.

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

d) Monitoring and/or Recordkeeping Requirements

Coating Overspray Filter Requirements

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

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

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

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

a. the date of the inspection;

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

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

d. the name of person who performed the inspection.

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

(5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer=s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

Coating Usage and Emissions Estimates Requirements

(6) The permittee shall collect and record the following information for each day for each of the emissions units specified in 1:

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

b. the number of gallons of each coating and cleanup material employed;

c. an identification of each material as non-photochemically reactive or photochemically reactive;

d. the VOC and OC contents of each coating and cleanup material, in lbs/gal;

e. the individual hazardous air pollutant (HAP) content of each coating and cleanup material, in lbs/gal;

f. the total VOC emissions rate for all coatings and all cleanup materials, in lbs/day; and

g. the total OC emissions rate for all coatings and all cleanup materials, in lbs/day.

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

(7) The permittee shall collect and record the following information for each month for each of the emissions units specified in 1:

a. the total volume of all coatings and all cleanup materials employed, in gal/month;

b. the total emissions for all coatings and all cleanup materials of all VOCs, in tons/month;

c. the total emissions for all coatings and all cleanup materials of each individual HAP, in tons/month; and

d. the total emissions for all coatings and all cleanup materials of all HAPs combined, in tons/month.

[Note: A HAP is any air pollutant listed in or pursuant to section 112(b) of the Clean Air Act (42 U.S.C. 7401 et. Seq. and amendments).]

Toxic Air Contaminant Requirements

(8) The federally enforceable permit-to-install (FEPTI) application for PTI# 02-13045 for these emissions unit(s), R001 – R004, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The AToxic Air Contaminant Statute@, ORC 3704.03(F), was applied to these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as

SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled AReview 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) AThreshold 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) AThreshold 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 was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., A**X**@ hours per day and A**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 x 8/X x 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 Aworst case@ toxic contaminant(s):

   Toxic Contaminant: propylene glycol methyl ether

   Maximum Hourly Emission Rate (lb/hr): 24.2 from R001-R004 combined

   Predicted 1-Hour Maximum Ground-Level Concentration (µg/m^3): 1,504.23 from R001-R004 combined

   MAGLC (µg/m^3): 14,430

   TLV (mg/m^3): 606,000

   The permittee, has demonstrated that emissions of propylene glycol methyl ether, from emissions unit(s) R001 through R004, is calculated to be less than

eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the AToxic Air Contaminant Statute@, ORC 3704.03(F).

(9) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration@, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

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

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

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute@, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to

be in compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(11) 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 AToxic 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.

e) Reporting Requirements

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

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

i. No more than 3.92 lbs PE/hr from each spray coating operation;

ii. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions;

iii. The prohibition of the use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5);

iv. No more than 650.4 lbs VOC/day; and

v. No more than 650.4 lbs OC/day.

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

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

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

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

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

(2) The permittee shall include any changes made to a parameter or value used in the dispersion model, 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, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

(1) Compliance with the allowable emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

b. Emission Limitation:

The PE rate from coatings overspray shall not exceed 3.92 lbs/hr at each emissions unit.

Applicable Compliance Method:

Compliance may be based on the following equation:

PE_coating overspray (HR) = S x T x IR x CR x (1 – CE).

where:

PE_coating overspray (HR) = controlled, particulate emissions rate, which is estimated to be 0.113 lb PE/hr for each emissions unit.

S = maximum solids content, 32%, by weight;

TE = transfer efficiency = lbs $solids_{OVERSPRAY}$/lbs $solids_{sprayed}$ = 50%;

IT = filter adherence overspray, 26%;

CR = coating (spray) rate, 220 $lbs_{COATING}$/hr; and

CE = filter control efficiency, which is 0.9877, from the results of a filter performance test, conducted for the filter manufacturer, Chemco Mfg. Co. Inc.

c. Emission Limitation:

The VOC emissions shall not exceed 650.4 lbs/day from coatings and cleanup materials usage at each emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(6)f.

d. Emission Limitation:

The OC emissions shall not exceed 650.4 lbs/day from coatings and cleanup materials usage at each emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(6)g.

e. Emission Limitation:

The OC emissions from coatings and cleanup materials usage shall not exceed 45.0 tons/year at each emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated by the summation of the daily OC emissions for the calendar year, based upon the record keeping requirements specified in d)(6)g divided by 2000 pounds/ton.

g) Miscellaneous Requirements

(1) None.