



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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

11/25/2009

Ms. Lori Hutchinson
ROBIN INDUSTRIES
300 WEST CLAY ST
FREDERICKSBURG, OH 44627

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0285000406
Permit Number: P0105680
Permit Type: Initial Installation
County: Wayne

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Daily Recorder. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.ohio.gov/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

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

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

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



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Robin Industries, Inc. plans to move its Berlin division (0238000164) to its Fredericksburg facility (0285000406). The new installation includes two miscellaneous metal parts and products dip coating operations (K001 and K002). There are three existing coating operations in Fredericksburg facility, R001, R002, and R003. Emissions units R001 and R002 are plastic dip coating operations and will remain as coating plastic parts. Emissions unit R003 is spray coating operation and will be modified to coat both metal and plastic parts.

There are de minimus sources in (will be in) Fredericksburg facility, includes plastic molding presses (total PTE 0.0306 ton VOC per year), mold release units (total PTE 0.0658 ton VOC per year), post cure operation (PTE 0.0278 ton VOC per year), and rubber molding presses (total PTE 7.0026 tons VPC per year).

3. Facility Emissions and Attainment Status:

The facility is located at Fredericksburg, Wayne County, an area designated as "attainment" for all criteria pollutants, such as ozone, sulfur dioxide, PM_{2.5}, carbon monoxide and lead. Robin Industries, Fredericksburg facility is not a "Major Source" for volatile organic compound (VOC) emissions and will not be a "Major Source" for any single hazardous air pollutant (HAP) and combined total HAPs, based upon the facility-wide restrictions of any single HAP emissions and combined total HAPs emissions. The requirements of Title V and MACT, subpart M, National Emission Standards for Surface Coating of Misc. Metal Parts and Products, are not subject to this facility.

4. Source Emissions:

This FEPTIO contains terms and conditions that restrict the facility-wide any single HAP emissions not to exceed 9.90 tons per year, and combined total HAPs not to exceed 24.90 tons per year. Robin Industries, Fredericksburg facility is also required by this permit to track emissions of any single HAP and combined total HAPs, keep records, and submit reports.

5. Conclusion:

The emission limitations contained in this FEPTIO are adequate to provide federally enforceable limitations to ensure that the MACT, subpart M and Title V thresholds will not be exceeded.

6. Please provide additional notes or comments as necessary:

Even though Robin Industries owns both its Holmco Division and Fredericksburg facility, the two plants are not adjacent or contiguous for the purposes of OAC rule 3745-77-01 (W) in accordance with Engineering Guide #58. The two divisions are more than five miles apart and they are not economically or operationally



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Permit Strategy Write-Up
 Permit Number: P0105680
 Facility ID: 0288000406

dependent on or support to each other. Therefore, these two plants are not concerned as the ONE facility for Title V purpose.

The spray coating operation, R003, subject to MACT subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

However, MACT, subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, is not applicable to all metal coating operations, K001, K002, and R003. It is because they are not in the nine source categories.

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

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|---|----------------------|
| VOC _{K001, K002, R001 – R003} | 81.75 |
| Any Single HAP _{facility-wide} | 9.90 |
| Combined Total HAP _{facility-wide} | 24.90 |

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
ROBIN INDUSTRIES

Issue Date: 11/25/2009
Permit Number: P0105680
Permit Type: Initial Installation
Permit Description: Federally enforceable synthetic minor permit for new installation of two metal coating booths and modification of three coating operations.
Facility ID: 0285000406
Facility Location: ROBIN INDUSTRIES
300 WEST CLAY ST,
Fredericksburg, OH 44627
Facility Description: All Other Plastics Product Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Tracy Gu at Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road or (330)425-9171. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



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

DRAFT

**Air Pollution Permit-to-Install and Operate
for
ROBIN INDUSTRIES**

Facility ID: 0285000406
Permit Number: P0105680
Permit Type: Initial Installation
Issued: 11/25/2009
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



Air Pollution Permit-to-Install and Operate
for
ROBIN INDUSTRIES

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Draft Permit-to-Install and Operate

Permit Number: P0105680

Facility ID: 0285000406

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0285000406

Application Number(s): A0038484, A0038663, A0038701

Permit Number: P0105680

Permit Description: Federally enforceable synthetic minor permit for new installation of two metal coating booths and modification of three coating operations.

Permit Type: Initial Installation

Permit Fee: \$1,600.00 *DO NOT send payment at this time - subject to change before final issuance*

Issue Date: 11/25/2009

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

ROBIN INDUSTRIES
300 WEST CLAY ST
Fredericksburg, OH 44627

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: P0105680

Permit Description: Federally enforceable synthetic minor permit for new installation of two metal coating booths and modification of three coating operations.

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

| | |
|-----------------------------------|---------------------|
| Emissions Unit ID: | R003 |
| Company Equipment ID: | Spray coating booth |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |

Group Name: Metal Coating Operations

| | |
|-----------------------------------|----------------|
| Emissions Unit ID: | K001 |
| Company Equipment ID: | Dip coating 1 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | K002 |
| Company Equipment ID: | Dip coating 2 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |

Group Name: Plastic Coating Operations

| | |
|-----------------------------------|----------------|
| Emissions Unit ID: | R001 |
| Company Equipment ID: | Dip Spinner 1 |
| Superseded Permit Number: | P0105173 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | R002 |
| Company Equipment ID: | Dip Spinner 2 |
| Superseded Permit Number: | P0105173 |
| General Permit Category and Type: | Not Applicable |



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Draft Permit-to-Install and Operate

Permit Number: P0105680

Facility ID: 0285000406

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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



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

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105680

Facility ID: 0285000406

Effective Date: To be entered upon final issuance

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

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

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

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



State of Ohio Environmental Protection Agency
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Draft Permit-to-Install and Operate

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B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105680

Facility ID: 0285000406

Effective Date: To be entered upon final issuance

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

Draft Permit-to-Install and Operate

Permit Number: P0105680

Facility ID: 0285000406

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. R003, Spray coating booth

Operations, Property and/or Equipment Description:

Spray coating 1. Spray coating operation for coating plastic or metal parts with adhesives.

- 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)(6), d)(7), d)(8), d)(9), and e)(3).
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)f, b)(2)e, c)(2), d)(5), e)(4), f)(1)f and f)(1)g.
- 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 3745-17-11(C) | See c)(1), d)(10), d)(11), d)(12), d)(13), and d)(14). |
| b. | OAC rule 3745-21-07(G)(2) | Forty (40) pounds per day and eight (8) pounds per hour of organic compound (OC) emissions from this emissions unit for each day during which any photochemically reactive material is employed. See b)(2)a below. |
| c. | OAC rule 3745-21-07(M)(2) | See b)(2)b below. |
| d. | OAC rule 3745-21-09(U)(2)(e)(iii) | See b)(2)c below. |
| e. | OAC rule 3745-31-05(A)(3) | See b)(2)d below. The requirements of this rule also include compliance with OAC rule 3745-21-09 (U)(2)(e)(iii), and 40 CFR Part 63, subpart HHHHHH. |
| f. | OAC rule 3745-31-05(D)(1)(b) | See b)(2)e and c)(2) below. |
| g. | OAC rule 3745-114 | See d)(6), d)(7), d)(8), d)(9), and e)(3) below. |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|---|---|
| h. | 40 CFR Part 63, subpart HHHHHH (40 CFR 63.11169 – 63.11180) | See b)(2)f, b)(2)g, b)(2)h, b)(2)i, d)(15), e)(7), f)(3) and f)(4) below. |

(2) Additional Terms and Conditions

- a. This emissions unit becomes subject to OAC rule 3745-21-07(G)(2) on any day when any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), is employed.

The OC emission limitations of eight (8) pounds per hour and forty (40) pounds per day when photochemically reactive materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07 (G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting, and testing requirements related to these hourly and daily limitations shall be void.

- b. In accordance with OAC rule 3745-21-07(M)(3)(a), OAC rule 3745-21-07(M)(2) is not applicable because the emissions unit is not equipped with OC emissions control devices.
- c. The permittee shall not employ more than 10 gallons of coating per day for the miscellaneous metal parts and products coating operation. The daily usage limitation shall not include coatings applied to parts or products which are not metal.
- d. Volatile organic compound (VOC) emissions from this emissions unit shall not exceed:
 - i. 76.85 pounds per day and 14.03 tons per year, when coating miscellaneous metal parts and products; and
 - ii. 7.30 tons per year, when coating plastic parts.
- e. The permittee proposed the following facility-wide restrictions to avoid Title V requirements, as well as MACT requirements under 40 CFR Part 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products:
 - i. Facility-wide emissions of each single hazardous air pollutant (HAP) shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of monthly emissions; and
 - ii. Facility-wide emissions of combined total HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.



- f. Table I to Subpart HHHHHH of Part 63 – Applicability of General Provisions to Subpart HHHHHH of Part 63 shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
- g. In accordance with 40 CFR §63.11173 (e), this miscellaneous surface coating operation must meet the following requirements:
 - i. All painters must be certified that they have completed training in the proper spray application of surface coatings and proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in b)(2)h below. The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in b)(2)h below. The requirements of this paragraph do not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of this paragraph.
 - ii. All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of b)(2)g.i above and either b)(2)g.iii.(a), b)(2)g.ii.(b) or b)(2)g.ii.(c) below.
 - (a) All spray booths, preparation stations, and mobile enclosures, including in this emissions unit, must be fitted with a type of filter technology that is demonstrated to achieve at least 98% capture of paint overspray.
 - (b) Spray booths and preparation stations, including in this emissions unit, that are used to coat miscellaneous parts and products must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.
 - (c) Mobile ventilated enclosures that are used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.
 - iii. All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator of US EPA.
 - iv. All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through



the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used.

- v. The U.S. EPA may choose to grant the permittee permission to use an alternative to the emission standards in this section after the permittee has requested approval to do so according 40 CFR §63.6 (g)(2).
- h. In accordance 40 CFR §63.11173 (f), each owner or operator of this emissions unit, miscellaneous surface coating source, must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in 40 CFR §63.11180, are trained in the proper application of surface coatings as required by b)(2)g.i above. The training program must include, at a minimum, the items listed in the following:
 - i. A list of all current personnel by name and job description who are required to be trained.
 - ii. Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed as follows:
 - (a) Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.
 - (b) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.
 - (c) Routine spray booth and filter maintenance, including filter selection and installation.
 - (d) Environmental compliance with the requirements of 40 CFR Part 63, subpart HHHHHH.
 - iii. A description of the methods to be used at the completion of initial or refresher training to demonstrate, documents, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in b)(2)h.ii above are not required to provide the initial training required by b)(2)h.ii to these painters.
- i. In accordance with 40 CFR §63.11173 (g), as required by b)(2)g.i above, all new and existing personnel at this emissions unit, an affected miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, as defined in 40 CFR §63.11180, must be trained by the dates specified in the following. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire:



- i. This is an existing source, all personnel must be trained and certified no later than 180 days after hiring or no later than January 10, 2011, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in b)(2)h.ii above satisfies this requirement and is valid for a period not to exceed five years after the date the training is complete.
- ii. Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be recertified every five years.

c) Operational Restrictions

- (1) All exhaust from this emissions unit shall pass through the dry filters whenever it is in operation.
- (2) To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the following facility-wide emission levels specified in the following table:

| Month(s) | Maximum Allowable Cumulative Emissions of Each Single HAP (tons) | Maximum Allowable Cumulative Emissions of Combined Total HAPs (tons) |
|----------|---|---|
| 1 | 1.0 | 2.5 |
| 1-2 | 2.0 | 5.0 |
| 1-3 | 3.0 | 7.5 |
| 1-4 | 4.0 | 10.0 |
| 1-5 | 5.0 | 12.5 |
| 1-6 | 6.0 | 15.0 |
| 1-7 | 7.0 | 17.5 |
| 1-8 | 8.0 | 20.0 |
| 1-9 | 9.0 | 22.5 |
| 1-10 | 9.90 | 24.9 |
| 1-11 | 9.90 | 24.9 |
| 1-12 | 9.90 | 24.9 |



After the first 12 calendar months of following the issuance of this permit, compliance with the annual emission limitations for each single HAP and combined total HAPs shall be based upon a rolling, 12-month summation of the emissions of each single HAP and combined total HAPs.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records for this emissions unit that document all time periods during which any dry filters were not in service when the emissions unit was in operation.
- (2) The permittee shall collect and record the following information each day for this emissions unit, when coating plastic parts, during which any photochemically reactive material is employed:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed minus the number of gallons of each coating and cleanup material recovered for disposal;
 - c. the OC content of each coating and cleanup material, in pounds OC per gallon;
 - d. the total OC emissions from all the coatings and cleanup materials, in pounds per day, i.e., the summation of the products of “b” times “c” for each coating and cleanup material;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly OC emission rate for all the coatings and cleanup materials, i.e., (d)/(e), in pounds per hour.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of “photochemically reactive material” is based upon OAC rule 3745-21-01(C)(5).]

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, the reference of photochemically reactive material in this section shall be voided.]

- (3) The permittee shall collect and record the following information each day, when coating miscellaneous metal parts and products, for the coating and cleanup materials applied in this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the total volume, in gallons, of all of the coatings employed;
 - d. the VOC content for each coating applied, in pounds per gallon;
 - e. the total VOC emissions, in pounds, from all coatings applied, i.e., the summation of the products of “b” times “d” for each individual coating applied;



- f. the name and identification of each cleanup material employed;
 - g. the VOC content of each cleanup material, in pounds per gallon;
 - h. the number of gallons of each cleanup material employed;
 - i. the total VOC emissions, in pounds, from all cleanup materials, i.e., the summation of the products of “g” times “h” for all cleanup materials employed; and
 - j. the total VOC emissions from all coatings and cleanup materials employed, in pounds, the sum of “e” and “i”.
- (4) The permittee shall collect and record the following information each month for this emissions unit:
- a. the volume, in gallons, of each coating and cleanup material employed, i.e., the summation of daily coating and cleanup material usage, recorded in d)(2) and b)(3), for the month;
 - b. each single HAP content(s) for each coating and cleanup material applied, in pounds per gallon;
 - c. the total emissions of each single HAP from all coatings and cleanup materials applied, i.e., the summation of the products of “a” times “b” for each individual coating and cleanup material applied;
 - d. the combined total HAPs content for each coating and cleanup material applied, in pounds per gallon; and
 - e. the total emissions of combined total HAPs from all coatings and cleanup materials applied, i.e., the summation of the products of “a” times “d” for each individual coating and cleanup material applied.
- (5) The permittee shall calculate and record the following facility-wide information each month:
- a. the monthly emissions of each single HAP, in tons per month;
 - b. the rolling, 12-month summation of emissions of each single HAP, in tons;
 - c. the monthly combined total HAPs emissions, in tons per month; and
 - d. the rolling, 12-month summation of combined total HAPs emissions, in tons.
- (6) This FEPTIO application for emissions units K001, K002, R001, R002, and R003 was evaluated based on the actual materials and the design parameters of the emissions units’ exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to these 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 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 results 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 or "worst case" toxic contaminant(s):

Compound: Methyl isobutyl ketone

- i. TLV (mg/m3): 204.82618

Maximum Hourly Emission Rate (lbs/hr): 4.64

Predicted 1-Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$): 955.83

MAGLC ($\mu\text{g}/\text{m}^3$): 4,876.81

- ii. Compound: Xylene

TLV (mg/m3): 434.19223

Maximum Hourly Emission Rate (lbs/hr): 6.42



Predicted 1-Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$): 2236.91

MAGLC ($\mu\text{g}/\text{m}^3$): 10,337.91

iii. Compound: Ethyl Benzene

TLV (mg/m^3): 434.19223

Maximum Hourly Emission Rate (lbs/hr): 1.51

Predicted 1-Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$): 526.72

MAGLC ($\mu\text{g}/\text{m}^3$): 10,337.91

The permittee, has demonstrated that emissions of methyl isobutyl ketone, xylene, and ethyl benzene from these emissions units 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).

- (7) Prior to making any physical changes to or changes in the method of operation of the emissions units, 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", ORC 3704.03(F), 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", 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 units, 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.



- (8) 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.
- (9) 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
- (10) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.
- (11) The permittee shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.
- (12) The permittee shall conduct periodic inspections of the control devices to determine whether the devices 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 control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.



- (13) The permittee shall document each inspection of a control device 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.
- (14) In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.
- (15) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, subpart HHHHHH, including sections 63.11177 and 63.11178.

e) Reporting Requirements

- (1) The permittee shall notify the Director in writing of any daily record that showing the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.
- (2) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that this emissions unit employs more than 10 gallons maximum daily coating usage limit for coating miscellaneous metal parts and products. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.
- (3) 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 quarterly deviation (excursion) reports. 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.
- (4) 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. the facility-wide emissions of each single HAP shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation of monthly emissions; and
 - ii. the facility-wide emissions of combined total HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summations of monthly emissions.
 - b. the probable cause of each deviation (excursion);



- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

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

- (5) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for each emissions unit in the annual Fee Emission Report.
- (6) 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 twelve-months for each air contaminant source identified in this permit.
- (7) The permittee shall submit notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, subpart HHHHHH, per the following sections:

| | |
|--------------|--|
| 63.11175(a) | Initial Notification |
| 63.11175 (b) | Notification of Compliance Status |
| 63.11176(a) | Annual Notification of Changes reports |

f) Testing Requirements

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

Forty (40) pounds per day and eight (8) pounds per hour of OC emissions, when coating plastic parts, for each day during which any photochemically reactive material is employed

Applicable Compliance Method:



Compliance with the daily and hourly allowable OC emission limitations shall be determined based upon the record keeping requirements specified in d)(2).

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

[After the revision to OAC rule 3745-21-07 (G) is approved into the Ohio SIP, this section shall be voided entirely.]

b. Emission Limitation:

The permittee shall not employ more than 10 gallons of coating per day for coating miscellaneous metal parts and products in this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3)c.

c. Emission Limitation:

VOC emissions, generated from coating miscellaneous metal parts and products, shall not exceed 76.85 pounds per day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3)j.

d. Emission Limitation:

VOC emissions from this emissions unit shall not exceed 14.03 tons per year, when coating miscellaneous metal parts and products

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3)j and shall be the summation of the calendar year

e. Emission Limitation:

VOC emissions from this emissions unit shall not exceed 7.30 tons per year, when coating when coating plastic parts.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(2)f and shall be the summation of the calendar year.



f. Emission Limitation:

Facility-wide emissions of each single HAP shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.

Applicable Compliance Method:

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

g. Emission Limitation:

Facility-wide emissions of combined total HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.

Applicable Compliance Method:

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

- (2) Any determination of VOC content, solids contents, or density of coating material or cleanup material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-04(B)(5), the permittee shall determine the composition of the coatings or cleanup material by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.
- (3) In accordance with 40 CFR Part 63, §63.11173 (e)(2)(i), the procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see §63.14 of subpart A of 40 CFR Part 63). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement.
- (4) In accordance with 40 CFR Part 63, §63.11173 (e)(3), the procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002" (incorporated by reference, see §63.14 of



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105680

Facility ID: 0285000406

Effective Date: To be entered upon final issuance

subpart A of 40 CFR Part 63). The requirements of this paragraph do not apply to painting performed by students and instructors at paint training centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

g) Miscellaneous Requirements

(1) None.



2. Emissions Unit Group - Metal Coating Operations: K001, K002,

| EU ID | Operations, Property and/or Equipment Description |
|--------------|---|
| K001 | Dip coating 1. Dip coating operation for coating metal parts and products with adhesives. |
| K002 | Dip coating 2. Dip coating operation for coating metal parts and products with adhesives. |

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)(4), d)(5), d)(6), d)(7), 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. b)(1)d, b)(2)c, c)(1), d)(3), e)(3), f)(1)c, and f)(1)d

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 3745-17-11(C) | See b)(2)e below. |
| b. | OAC rule 3745-21-09(U)(2)(e)(iii) | See b)(2)a below. |
| c. | OAC rule 3745-31-05(A)(3) | See b)(2)b below. The requirements of this rule also include compliance with OAC rule 3745-21-09 (U)(2)(e)(iii). |
| d. | OAC rule 3745-31-05(D)(1)(b) | See b)(2)c and c)(1) below. |
| e. | OAC rule 3745-114 | See d)(4), d)(5), d)(6), d)(7), and e)(2) below. |
| f. | 40 CFR Part 63, subpart HHHHHH | See b)(2)d below. |

(2) Additional Terms and Conditions

a. The permittee shall not employ more than 10 gallons of coating per day for each of the miscellaneous metal parts and products coating operations.



- b. Volatile organic compound (VOC) emissions from each emissions unit (K001 and K002) shall not exceed 11.64 tons per year, based upon a rolling, 12-month summation of monthly emissions.
- c. The permittee proposed the following facility-wide restrictions to avoid Title V requirements, as well as MACT requirements under 40 CFR Part 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products:
 - i. Facility-wide emissions of each single hazardous air pollutant (HAP) shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of monthly emissions; and
 - ii. Facility-wide emissions of combined total HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.
- d. These emissions units are exempt from the requirements of 40 CFR Part 63, subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, because these emissions units are not spray-applied coating operations, as defined in 40 CFR §63.11180.
- e. These emissions units are exempt from the requirements of OAC rule 3745-17-11 (C) because these emissions units are dip coating operations.

c) Operational Restrictions

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

| Month(s) | Maximum Allowable Cumulative Emissions of Each Single HAP (tons) | Maximum Allowable Cumulative Emissions of Combined Total HAPs (tons) |
|----------|---|---|
| 1 | 1.0 | 2.5 |
| 1-2 | 2.0 | 5.0 |
| 1-3 | 3.0 | 7.5 |
| 1-4 | 4.0 | 10.0 |
| 1-5 | 5.0 | 12.5 |
| 1-6 | 6.0 | 15.0 |
| 1-7 | 7.0 | 17.5 |
| 1-8 | 8.0 | 20.0 |



| Month(s) | Maximum Allowable Cumulative Emissions of Each Single HAP (tons) | Maximum Allowable Cumulative Emissions of Combined Total HAPs (tons) |
|----------|---|---|
| 1-9 | 9.0 | 22.5 |
| 1-10 | 9.90 | 24.9 |
| 1-11 | 9.90 | 24.9 |
| 1-12 | 9.90 | 24.9 |

After the first 12 calendar months of following the issuance of this permit, compliance with the annual emission limitations for each single HAP and combined total HAPs shall be based upon a rolling, 12-month summation of the emissions of each single HAP and combined total HAPs.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on each day for each emissions unit (K001 and K002):
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all of the coatings employed.

- (2) The permittee shall collect and record the following information each month for each emissions unit (K001 and K002):
 - a. the volume, in gallons, of each coating employed, i.e., the summation of daily coating usage, recorded in d)(2), for the month;
 - b. the VOC content for each coating applied, in pounds per gallon;
 - c. the total VOC emissions, in pounds, from all coatings applied, i.e., the summation of the products of "a" times "b" for each individual coating applied
 - d. the individual HAP content(s) for each coating applied, in pounds per gallon;
 - e. the total emissions of each single HAP, in pounds, from all coatings applied, i.e., the summation of the products of "a" times "d" for each individual coating applied;
 - f. the combined total HAPs content for each coating applied, in pounds per gallon;
 - g. the total emissions of combined total HAPs from all coatings applied, i.e., the summation of the products of "a" times "f" for each individual coating applied;
 - h. the number of gallons of each cleanup material employed;



- i. each single HAP content of each cleanup material, in pounds per gallon;
 - j. the total emissions of each single HAP, in pounds, from all cleanup materials employed, i.e., the summation of the products of “h” times “i” for each individual cleanup material employed;
 - k. the combined total HAPs content for each cleanup material employed, in pounds per gallon;
 - l. the total emissions of combined total HAPs, in pounds, from all cleanup materials employed, i.e., the summation of the products of “h” times “k” for each individual cleanup material employed;
 - m. the VOC content for each cleanup material employed, in pounds per gallon;
 - n. the total VOC emissions, in pounds, from all cleanup materials employed, i.e., the summation of the products of “h” times “m” for each individual cleanup material employed;
 - o. the total emissions of each individual HAP from all coatings and cleanup materials employed, in pounds or tons, the sum of “e” and “j”;
 - p. the total emissions of total combined HAPs from all coatings and cleanup materials employed, in pounds or tons, the sum of “g” and “l”;
 - q. the total VOC emissions from all coatings and cleanup materials employed, in tons, the sum of “c” and “n”; and
 - r. the rolling, 12-month summation of total VOC emissions from all coatings and cleanup materials, in tons.
- (3) The permittee shall calculate and record the following facility-wide information each month:
- a. the monthly emissions of each single HAP, in tons per month;
 - b. the rolling, 12-month summation of emissions of each single HAP, in tons;
 - c. the monthly combined total HAPs emissions, in tons per month; and
 - d. the rolling, 12-month summation of combined total HAPs emissions, in tons.
- (4) This FEPTIO application for emissions units K001, K002, R001, R002, and R003 was evaluated based on the actual materials and the design parameters of the emissions units’ exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to these 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 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 results 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 or “worst case” toxic contaminant(s):

Compound: Methyl isobutyl ketone

- i. TLV (mg/m3): 204.82618
Maximum Hourly Emission Rate (lbs/hr): 4.64
Predicted 1-Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$): 955.83
MAGLC ($\mu\text{g}/\text{m}^3$): 4,876.81
- ii. Compound: Xylene
TLV (mg/m3): 434.19223
Maximum Hourly Emission Rate (lbs/hr): 6.42
Predicted 1-Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$): 2236.91



MAGLC ($\mu\text{g}/\text{m}^3$): 10,337.91

iii. Compound: Ethyl Benzene

TLV (mg/m^3): 434.19223

Maximum Hourly Emission Rate (lbs/hr): 1.51

Predicted 1-Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$): 526.72

MAGLC ($\mu\text{g}/\text{m}^3$): 10,337.91

The permittee, has demonstrated that emissions of methyl isobutyl ketone, xylene, and ethyl benzene from these emissions units 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).

- (5) Prior to making any physical changes to or changes in the method of operation of the emissions units, 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", ORC 3704.03(F), 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", 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 units, 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.

- (6) 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.
- (7) 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
- e) Reporting Requirements
- (1) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that each emissions unit (K001 and K002) employs more than 10 gallons maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.
 - (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 quarterly deviation (excursion) reports. 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.
 - (3) 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. the facility-wide emissions of each single HAP shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation of monthly emissions; and



- ii. the facility-wide emissions of combined total HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summations of monthly emissions.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

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

- (4) The permittee shall also submit annual reports that specify the total VOC emissions from each emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for each emissions unit in the annual Fee Emission Report.
- (5) 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 twelve-months for each air contaminant source identified in this permit..

f) Testing Requirements

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

The permittee shall not employ more than 10 gallons of coating per day in each emissions unit (K001 and K002).

Applicable Compliance Method:

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

VOC emissions from this emissions unit shall not exceed 11.64 tons per year, based upon a rolling, 12-month summation of monthly emissions



Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(2)r and shall be the summation of the calendar year.

c. Emission Limitation:

Facility-wide emissions of each single HAP shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3)b.

d. Emission Limitation:

Facility-wide emissions of combined total HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3)d.

(2) Any determination of VOC content, solids contents, or density of coating material or cleanup material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-04(B)(5), the permittee shall determine the composition of the coatings or cleanup material by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.

g) Miscellaneous Requirements

(1) None.



3. Emissions Unit Group - Plastic Coating Operations: R001, R002,

| EU ID | Operations, Property and/or Equipment Description |
|--------------|---|
| R001 | Dip spinner 1. Dip spin coating operation for coating plastic parts with adhesives. |
| R002 | Dip spinner 2. Dip spin coating operation for coating plastic parts with adhesives. |

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)(5), d)(6), d)(7), d)(8), 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. b)(1)e, b)(2)d, c)(1), d)(4), e)(3), f)(1)d, and f)(1)e.

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 3745-17-11(C) | See b)(2)f below. |
| b. | OAC rule 3745-21-07(G)(2) | Forty (40) pounds per day and eight (8) pounds per hour of organic compound (OC) emissions from this emissions unit for each day during which any photochemically reactive material is employed. See b)(2)a below. |
| c. | OAC rule 3745-21-07(M)(2) | See b)(2)b below. |
| d. | OAC rule 3745-31-05(A)(3) | See b)(2)c below. |
| e. | OAC rule 3745-31-05(D)(1)(b) | See b)(2)d and c)(1) below. |
| f. | OAC rule 3745-114 | See d)(5), d)(6), d)(7), d)(8), and e)(2) below. |
| g. | 40 CFR Part 63, subpart HHHHHH | See b)(2)e below. |

(2) Additional Terms and Conditions



- a. Each emissions unit (R001 and R002) becomes subject to OAC rule 3745-21-07(G)(2) on any day when any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), is employed.

The OC emission limitations of eight (8) pounds per hour and forty (40) pounds per day when photochemically reactive materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07 (G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting, and testing requirements related to these hourly and daily limitations shall be void.

- b. In accordance with OAC rule 3745-21-07(M)(3)(a), OAC rule 3745-21-07(M)(2) is not applicable because the emissions unit is not equipped with OC emissions control devices.
- c. On any day during which no photochemically reactive materials [as defined in OAC rule 3745-21-01(C)(5)] are employed, the volatile organic compound (VOC) emissions from all the coatings and clean up materials shall not exceed the following:

- i. For emissions unit R001, 4.21 pounds per hour and 18.44 tons per year; and
- ii. For emissions unit R002, 4.27 pounds per hour and 18.70 tons per year.

The requirement to comply with these emission limitations only on days when photochemically reactive coating or clean up material are not employed shall cease on the date the U.S. EPA approves revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the revised rule is added to the Ohio SIP, these emission limitations shall be effective every day when each emissions unit is in operation.

- d. The permittee voluntarily proposed the following facility-wide restrictions to avoid Title V requirements, as well as MACT requirements under 40 CFR Part 63, Subpart M, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products:
 - i. Facility-wide emissions of each single hazardous air pollutant (HAP) shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of monthly emissions; and
 - ii. Facility-wide emissions of combined total HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.
- e. These emissions unite are exempt from the requirements of 40 CFR Part 63, subpart H, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, because these emissions units are not spray-applied coating operations, as defined in 40 CFR §63.11180.



- f. These emissions units are exempt from the requirements of OAC rule 3745-17-11 (C) because these emissions units are dip coating operations.

c) Operational Restrictions

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

| Month(s) | Maximum Allowable Cumulative Emissions of Each Single HAP (tons) | Maximum Allowable Cumulative Emissions of Combined Total HAPs (tons) |
|----------|---|---|
| 1 | 1.0 | 2.5 |
| 1-2 | 2.0 | 5.0 |
| 1-3 | 3.0 | 7.5 |
| 1-4 | 4.0 | 10.0 |
| 1-5 | 5.0 | 12.5 |
| 1-6 | 6.0 | 15.0 |
| 1-7 | 7.0 | 17.5 |
| 1-8 | 8.0 | 20.0 |
| 1-9 | 9.0 | 22.5 |
| 1-10 | 9.90 | 24.9 |
| 1-11 | 9.90 | 24.9 |
| 1-12 | 9.90 | 24.9 |

After the first 12 calendar months of following the issuance of this permit, compliance with the annual emission limitations for each single HAP and combined total HAPs shall be based upon a rolling, 12-month summation of the emissions of each single HAP and combined total HAPs.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for each emissions unit (R001 and R002), when coating plastic parts, during which any photochemically reactive material is employed:
 - a. the company identification for each coating and cleanup material employed;



- b. the number of gallons of each coating and cleanup material employed minus the number of gallons of each coating and cleanup material recovered for disposal;
- c. the OC content of each coating and cleanup material, in pounds OC per gallon;
- d. the total OC emissions from all the coatings and cleanup materials, in pounds per day; i.e., the summation of the products of “b” times “c” for each coating and cleanup material;
- e. the total number of hours the emissions unit was in operation; and
- f. the average hourly OC emission rate for all the coatings and cleanup materials, i.e., (d)/(e), in pounds per hour.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of “photochemically reactive material” is based upon OAC rule 3745-21-01(C)(5).]

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, section d)(2) shall be voided entirely.]

- (2) The permittee shall collect and record the following information each day for each emissions unit (R001 and R002) during which no photochemically reactive materials are employed:

- a. The company identification for each coating and cleanup material employed;
- b. Documentation on whether or not each material employed (coating and cleanup) was a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
- c. The VOC content of each coating and clean up material, in lbs/gallon, as applied;
- d. The number of gallons of each coating and clean up material employed minus the number of gallons of each coating and clean up material recovered for disposal;
- e. The total VOC emissions from all the coatings and clean up materials employed, in lbs/day, i.e., sum of (c) times (d);
- f. The total number of hours the emissions unit was in operation; and
- g. The average hourly VOC emission rate for all the coatings and cleanup materials employed, i.e., (e)/(f), in lbs/hr.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, the records required by this section shall be on a daily basis with no reference to photochemically reactive materials. Section d)(3)b shall be voided entirely.]

- (3) The permittee shall collect and record the following information each month for each emissions unit (R001 and R002):



- a. the volume, in gallons, of each coating and cleanup material employed, i.e., the summation of daily coating and cleanup material usage, recorded in d)(2)b and d)(3)d, for the month;
 - b. each single HAP content(s) for each coating and cleanup material applied, in pounds per gallon;
 - c. the total emissions of each single HAP from all coatings and cleanup materials applied, i.e., the summation of the products of “a” times “b” for each individual coating and cleanup material applied;
 - d. the combined total HAPs content for each coating and cleanup material applied, in pounds per gallon; and
 - e. the total emissions of combined total HAPs from all coatings and cleanup materials applied, i.e., the summation of the products of “a” times “d” for each individual coating and cleanup material applied.
- (4) The permittee shall calculate and record the following facility-wide information each month:
- a. the monthly emissions of each single HAP, in tons per month;
 - b. the rolling, 12-month summation of emissions of each single HAP, in tons;
 - c. the monthly combined total HAPs emissions, in tons per month; and
 - d. the rolling, 12-month summation of combined total HAPs emissions, in tons.
- (5) This FEPTIO application for emissions units K001, K002, R001, R002, and R003 was evaluated based on the actual materials and the design parameters of the emissions units’ exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to these 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 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 results 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 or “worst case” toxic contaminant(s):

Compound: Methyl isobutyl ketone

- i. TLV (mg/m³): 204.82618
 Maximum Hourly Emission Rate (lbs/hr): 4.64
 Predicted 1-Hour Maximum Ground Level Concentration (µg/m³): 955.83
 MAGLC (µg/m³): 4,876.81
- ii. Compound: Xylene
 TLV (mg/m³): 434.19223
 Maximum Hourly Emission Rate (lbs/hr): 6.42
 Predicted 1-Hour Maximum Ground Level Concentration (µg/m³): 2236.91
 MAGLC (µg/m³): 10,337.91
- iii. Compound: Ethyl Benzene
 TLV (mg/m³): 434.19223
 Maximum Hourly Emission Rate (lbs/hr): 1.51
 Predicted 1-Hour Maximum Ground Level Concentration (µg/m³): 526.72
 MAGLC (µg/m³): 10,337.91



The permittee, has demonstrated that emissions of methyl isobutyl ketone, xylene, and ethyl benzene from these emissions units 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).

- (6) Prior to making any physical changes to or changes in the method of operation of the emissions units, 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", ORC 3704.03(F), 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", 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 units, 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.

- (7) 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.

(8) 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

e) Reporting Requirements

(1) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that this emissions unit employs more than 10 gallons maximum daily coating usage limit for coating miscellaneous metal parts and products. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.

(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 quarterly deviation (excursion) reports. 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.

(3) 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. the facility-wide emissions of each single HAP shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation of monthly emissions; and

ii. the facility-wide emissions of combined total HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summations of monthly emissions.

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

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

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



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

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

- (4) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for each emissions unit in the annual Fee Emission Report.
- (5) 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 twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitations:

Forty (40) pounds per day and eight (8) pounds per hour of OC emissions, when coating plastic parts, for each day during which any photochemically reactive material is employed

Applicable Compliance Method:

Compliance with the daily and hourly allowable OC emission limitations shall be determined based upon the record keeping requirements specified in d)(1).

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

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be voided entirely.]

b. Emission Limitation:

For each day during which no photochemically reactive material is employed, the VOC emissions shall not exceed:

- i. For emissions unit R001, 4.21 lbs/hr; and
- ii. For emissions unit R002, 4.27 lbs/hr.



Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(2)g.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, the reference of photochemically reactive material in this section shall be voided.]

c. Emission Limitation:

For each day during which no photochemically reactive material is employed, the VOC emissions shall not exceed:

- i. For emissions unit R001, 18.44 tons per year; and
- ii. For emissions unit R002, 18.70 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(2)e and shall be the summation of the calendar year.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, the reference of photochemically reactive material in this section shall be voided.]

d. Emission Limitation:

Facility-wide emissions of each single HAP shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.

Applicable Compliance Method:

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

e. Emission Limitation:

Facility-wide emissions of combined total HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.

Applicable Compliance Method:

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

- (2) Any determination of VOC content, solids contents, or density of coating material or cleanup material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-04(B)(5), the permittee shall determine the composition of the coatings or cleanup material by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105680

Facility ID: 0285000406

Effective Date: To be entered upon final issuance

Reference Method 24 or Method 24A. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.

- g) Miscellaneous Requirements
 - (1) None.