

Synthetic Minor Determination and/or Netting Determination

Permit To Install: **01-12063**

A. Source Description

The applicant, Columbus Fixture Solutions (CFS) has submitted a PTI application for the Chapter 31 modification of three existing paint operations. These emissions units were previously permitted under PTI 01-8022 issued March 8, 2000. The purpose of the spray booths is to apply various finishes in the manufacturing of Fixtures.

B. Facility Emissions and Attainment Status

Franklin County is classified as nonattainment for the 8-hour ozone NAAQS and PM 2.5. CFS is classified as a synthetic minor facility for volatile organic compounds (VOC) and single hazardous air pollutant (HAP). Without synthetic minor limitations presented in these permits, potential emissions from the four spray booths and ten work areas would trigger Title V permitting thresholds levels. The facility wide emissions (tons per year), *with the current* synthetic minor limits found in PTI 01-8022 are:

CFS	VOC (TPY)	Individual HAP (TPY)	Combined HAP (TPY)
TOTAL	21.9	9.99	24.9

C. Source Emissions

CFS has proposed emission restrictions that correspond to potential VOC emissions as described in the table below.

Emission Unit	Description	Tons VOC
R001	Paint Booth #1	7.3
R002	Paint Booth #2	43.63
R003	Paint Booth #3	7.3

CFS has also requested that emissions from emissions units R001 through R003 not exceed 9.99 tons of any single HAP and 24.99 tons of all HAP.

Limiting emissions results in CFS having a PTE below those levels which trigger Title V and or non attainment NSR permitting requirements.

D. Conclusion

The permit contains operational restrictions, record keeping and reporting requirements to ensure on going compliance with the emission limitations. CFS will remain a synthetic minor facility. Emissions of any single HAP will not exceed 9.99 tons and total HAP emissions will not exceed 24.99 tons per year. The synthetic minor will effectively restrict the volatile organic compounds and hazardous air pollutant emissions below Title V . Additionally, the federally enforceable limits included in the proposed PTI will allow CFS to avoid non attainment new source review for the 8 hour ozone standard. This permitting action does not trigger 40 CFR 52(R)(4) because the allowable emissions are below the major stationary emission trigger levels.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
FRANKLIN COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

Application No: 01-12063

Fac ID: 0125041904

DATE: 8/3/2006

Columbus Fixture Solutions LLC
Robert Guda
5454 Alkire Rd
Columbus, OH 43228

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$600** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CDO

Mid-Ohio Regional Planning Commission



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 01-12063

Application Number: 01-12063
Facility ID: 0125041904
Permit Fee: **To be entered upon final issuance**
Name of Facility: Columbus Fixture Solutions LLC
Person to Contact: Robert Guda
Address: 5454 Alkire Rd
Columbus, OH 43228

Location of proposed air contaminant source(s) [emissions unit(s)]:

**5454 Alkire Rd
Columbus, Ohio**

Description of proposed emissions unit(s):

R001, R002, R003, spray booths, spray guns, paint pots, exhaust fans and filters.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

Columbus Fixture Solutions LLC**Facility ID: 0125041904****PTI Application: 01-12063****Issued: To be entered upon final issuance**

conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

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Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

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Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only) TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	58.23
Total HAP	24.99
Single HAP	9.99

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (R001) - coating operation

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The requirements of this rule include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-31-05(C), 3745-17-11(B) and 3745-17-07(A).
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 pounds per hour and 40 lbs/day.
OAC rule 3745-31-05(C) (synthetic minor to avoid NSR and Title V)	Organic compound (OC) emissions from this emissions unit shall not exceed 7.3 tons per rolling 12-month period. Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units R001 through R003 shall not exceed 9.99 tons per rolling 12-month period. Emissions of all HAPs from all materials employed by emissions units R001 through R003 shall not exceed 24.99 tons per rolling 12-month period.
OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 lb/hr.
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2. Additional Terms and Conditions

2.a None

B. Operational Restrictions

- The permittee shall operate the dry filtration system whenever this emissions unit is in operation, to control particulate emissions.

Emissions Unit ID: R001

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit R001:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material, in pounds per gallon;
 - d. the total number of hours the emissions unit was in operation;
 - e. the total OC emission rate for all coatings and cleanup materials, in pounds per day; and
 - f. the average hourly OC emission rate for all coatings and cleanup materials.
2. The permittee shall collect and record the following information each month for emissions unit R001:
 - a. the name and identification of each material employed by emissions unit R001;
 - b. the OC content for each material employed by emissions unit R001, in pounds per gallon, excluding water and exempt solvents, as applied;
 - c. the number of gallons applied, of each material;
 - d. the rolling, 12-month summation of the material usage, in gallons; and
 - e. the total OC emissions from all materials employed by R001, in tons per rolling, 12-month period
3. The permittee shall collect and record the following information each month for this emission unit:
 - a. the name and identification number of each coating, as applied;
 - b. the individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content for each HAP of each coating in pounds of

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- combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
- d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
 - j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

- 4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- 5. The permit to install for emissions units R001-R003 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted

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1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (mg/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 1.54

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 275.29

MAGLC (ug/m³): 10,333

Pollutant: Toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 3.14

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 561.36

MAGLC (ug/m³): 4476

Pollutant: Isobutyl Acetate

TLV (mg/m³): 713

Maximum Hourly Emission Rate (lbs/hr): 4.13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 738.45

MAGLC (ug/m³): 16,976

6. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would

Emissions Unit ID: **R001**

result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
7. If the permittee determines that the "Air Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. each day during which the average hourly OC emissions from coatings and cleanup materials exceeded 8.0 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. each day during which the OC emissions from coatings and cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day;
 - c. the VOC content of each coating and cleanup material employed by emissions unit R001;

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- d. the sum of the total OC emissions rates for all coating and cleanup material employed by emissions unit R001 in tons per rolling, 12-month period;
- e. the total emissions of each individual HAP from all coating and cleanup material, employed by emissions unit R001 through R003, in tons per rolling, 12-month period; and
- f. the total emissions of all HAPs for R001 through R003, in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall notify Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to Ohio EPA, Central District Office within 45 days after the exceedance occurs.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation: Organic compound (OC) emissions shall not exceed 8.0 lbs/hr and 40 lbs/day .

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.
 - b. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units R001 through R003 shall not exceed 9.99 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.
 - c. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units R001 through R003 shall not exceed 24.99 tons per rolling 12-month period.

Emissions Unit ID: R001

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- d. USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.
- e. Emissions Limitation: Organic compound (OC) emissions shall not exceed 7.3 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based the record keeping requirements as specified in C.2 above.

- f. Emission Limitations: Visible particulate emissions from the stack shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- g. Emission Limitation: Particulate emissions (PE) shall not exceed 0.55 lb/hr from coating operations.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

F. Miscellaneous Requirements

None

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (R002) - coating operation

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 9.96 pounds per hour. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C), 3745-17-11(B) and 3745-17-07(A).
OAC rule 3745-21-07(G)	None, see B.1 below.
OAC rule 3745-31-05(C) (synthetic minor to avoid NSR and Title V)	Organic compound (OC) emissions from this emissions unit shall not exceed 43.63 tons per rolling 12-month period. Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units R001 through R003 shall not exceed 9.99 tons per rolling 12-month period. Emissions of all HAPs from all materials employed by emissions units R001 through R003 shall not exceed 24.99 tons per rolling 12-month period.
OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 lb/hr.
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2. Additional Terms and Conditions

2.a None

B. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-

Emissions Unit ID: R002

01(C)(5), in this emissions unit is prohibited.

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation, to control particulate emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit R002:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material, in pounds per gallon;
 - d. the total number of hours the emissions unit was in operation;
 - e. the total OC emission rate for all coatings and cleanup materials, in pounds per day; and
 - f. the average hourly OC emission rate for all coatings and cleanup materials.
2. The permittee shall collect and record the following information each month for emissions unit R002:
 - a. the name and identification of each material employed by emissions unit R002;
 - b. the OC content for each material employed by emissions unit R002, in pounds per gallon, excluding water and exempt solvents, as applied;
 - c. the number of gallons applied, of each material;
 - d. the rolling, 12-month summation of the material usage, in gallons; and
 - e. the total OC emissions from all materials employed by R002, in tons per rolling, 12-month period
3. The permittee shall collect and record the following information each month for this emission unit:

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- a. the name and identification number of each coating, as applied;
- b. the individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
- c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
- d. the number of gallons of each coating employed;
- e. the name and identification of each cleanup material employed;
- f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
- g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
- h. the number of gallons of each cleanup material employed;
- i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
- j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
5. The permit to install for emissions units R001-R003 was evaluated based on the

Emissions Unit ID: **R002**

actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (mg/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 1.54

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 275.29MAGLC (ug/m³): 10,333

Pollutant: Toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 3.14

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 561.36MAGLC (ug/m³): 4476

Pollutant: Isobutyl Acetate

TLV (mg/m³): 713

Maximum Hourly Emission Rate (lbs/hr): 4.13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 738.45MAGLC (ug/m³): 16,976

6. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as

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documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
7. If the permittee determines that the "Air Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC

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rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. each day during which the average hourly OC emissions from coatings and cleanup materials exceeded 9.96 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. the VOC content of each coating and cleanup material employed by emissions unit R002;
 - c. the sum of the total OC emissions rates for all coating and cleanup material employed by emissions unit R002 in tons per rolling, 12-month period;
 - d. the total emissions of each individual HAP from all coating and cleanup material, employed by emissions unit R001 through R003, in tons per rolling, 12-month period; and
 - e. the total emissions of all HAPs for R001 through R003, in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by

January 31 of each year.

3. The permittee shall notify the Director (the Ohio EPA, Central District Office) in writing of any daily record showing that a photochemically reactive material was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Central District Office) within 30 days after the event occurs.
4. The permittee shall notify Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to Ohio EPA, Central District Office within 45 days after the exceedance occurs.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation: Organic compound (OC) emissions shall not exceed 9.96 lbs/hr.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.
 - b. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units R001 through R003 shall not exceed 9.99 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.
 - c. Emission Limitation: Emissions of all HAPs from all materials employed by emissions units R001 through R003 shall not exceed 24.99 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.
 - d. USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify

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the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- e. Emissions Limitation: Organic compound (OC) emissions shall not exceed 43.63 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based the record keeping requirements as specified in C.2 above.

- f. Emission Limitations: Visible particulate emissions from the stack shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- g. Emission Limitation: Particulate emissions (PE) shall not exceed 0.55 lb/hr from coating operations.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (R003) - coating operation

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The requirements of this rule include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-31-05(C), 3745-17-11(B) and 3745-17-07(A).
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 pounds per hour and 40 lbs/day.
OAC rule 3745-31-05(C) (synthetic minor to avoid NSR and Title V)	Organic compound (OC) emissions from this emissions unit shall not exceed 7.3 tons per rolling 12-month period. Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units K001 through K003 shall not exceed 9.99 tons per rolling 12-month period. Emissions of all HAPs from all materials employed by emissions units R001 through R003 shall not exceed 24.99 tons per rolling 12-month period.
OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 lb/hr.
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2. Additional Terms and Conditions

2.a None

B. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation, to control particulate emissions.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit R003:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material, in pounds per gallon;
 - d. the total number of hours the emissions unit was in operation;
 - e. the total OC emission rate for all coatings and cleanup materials, in pounds per day; and
 - f. the average hourly OC emission rate for all coatings and cleanup materials.

2. The permittee shall collect and record the following information each month for emissions unit R003:
 - a. the name and identification of each material employed by emissions unit R003;
 - b. the OC content for each material employed by emissions unit R003, in pounds per gallon, excluding water and exempt solvents, as applied;
 - c. the number of gallons applied, of each material;
 - d. the rolling, 12-month summation of the material usage, in gallons; and
 - e. the total OC emissions from all materials employed by R003, in tons per rolling, 12-month period

3. The permittee shall collect and record the following information each month for this emission unit:
 - a. the name and identification number of each coating, as applied;
 - b. the individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;

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- c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
- d. the number of gallons of each coating employed;
- e. the name and identification of each cleanup material employed;
- f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
- g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
- h. the number of gallons of each cleanup material employed;
- i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material); and
- j. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

- 4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- 5. The permit to install for emissions units R001-R003 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year

Emissions Unit ID: **R003**

using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (mg/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 1.54

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 275.29MAGLC (ug/m³): 10,333

Pollutant: Toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 3.14

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 561.36MAGLC (ug/m³): 4476

Pollutant: Isobutyl Acetate

TLV (mg/m³): 713

Maximum Hourly Emission Rate (lbs/hr): 4.13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 738.45MAGLC (ug/m³): 16,976

6. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

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- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
7. If the permittee determines that the "Air Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. each day during which the average hourly OC emissions from coatings and cleanup materials exceeded 8.0 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. each day during which the OC emissions from coatings and cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day;

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- c. the VOC content of each coating and cleanup material employed by emissions unit R003;
- d. the sum of the total OC emissions rates for all coating and cleanup material employed by emissions unit R003 in tons per rolling, 12-month period;
- e. the total emissions of each individual HAP from all coating and cleanup material, employed by emissions unit R001 through R003, in tons per rolling, 12-month period; and
- f. the total emissions of all HAPs for R001 through R003, in tons per rolling, 12-month period.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall notify Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to Ohio EPA, Central District Office within 45 days after the exceedance occurs.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation: Organic compound (OC) emissions shall not exceed 8.0 lbs/hr and 40 lbs/day .

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- b. Emission Limitation: Emissions of any single hazardous air pollutant (HAP) from all materials employed by emissions units R001 through R003 shall not exceed 9.99 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- c. Emission Limitation: Emissions of all HAPs from all materials employed by

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emissions units R001 through R003 shall not exceed 24.99 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit.

- d. USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.
- e. Emissions Limitation: Organic compound (OC) emissions shall not exceed 7.3 tons per rolling 12-month period.

Applicable Compliance Method: Compliance shall be based the record keeping requirements as specified in C.2 above.

- f. Emission Limitations: Visible particulate emissions from the stack shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- g. Emission Limitation: Particulate emissions (PE) shall not exceed 0.55 lb/hr from coating operations.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

F. Miscellaneous Requirements

None