State of Ohio Environmental Protection Agency

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12/18/2009

Certified Mail

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

LOU GRIESHOP
J & M MFG CO INC
284 Railroad St
Ft. Recovery, OH 45846

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0354000124
Permit Number: P0105723
Permit Type: Administrative Modification
County: Mercer

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 Standard. 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, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

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, Northwest District Office at (419)352-8461.

Sincerely,

Michael W. Ahern

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

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

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   ___ Netting Determination

2. Source Description: J&M Manufacturing operates a farm equipment manufacturing facility in Fort Recovery, Ohio (Auglaize County).

3. Facility Emissions and Attainment Status: J&M Manufacturing is currently a synthetic minor facility with federally enforceable restrictions limiting potential emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAPs) below Title V and MACT major source thresholds. Potential VOC emissions are due to coating and clean-up operations using organic solvents. J&M Manufacturing is proposing an increase in production that would involve a potential increase in VOC emissions for their two main spray coating operations, emissions units K011 and K012. The proposed modification includes revising the current established synthetic minor restriction to increase VOC emissions.

   This permit modification will maintain previously established synthetic minor restrictions for hazardous air pollutants (HAP) for K011 and K012, and also a coating dip tank (K005), from PTI 03-13936.

   Mercer County is in attainment for all criteria pollutants.

4. Source Emissions: J&M Manufacturing has requested synthetic minor restrictions associated with a proposed production increase to limit VOC emissions for K011 and K012 (combined) to 76.84 tons per year (70 tons per year for coating operations and 6.84 tons per year for clean-up operations). The current limits (tons VOC per year) are 18.82 for coating and 2.62 for clean-up.

5. Conclusion: A synthetic minor restriction of 76.84 tons VOC per year for K011 and K012 along with maintaining the current synthetic minor restriction involving HAP emissions will limit the potential emissions for the facility below Title V and MACT major source thresholds.

6. Please provide additional notes or comments as necessary:

   None

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

Pollutant	Tons Per Year
VOC	76.84
Single HAP	9.90
Combined HAPs	20.0

Mercer County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
J & M MFG CO INC

Issue Date: 12/18/2009
Permit Number: P0105723
Permit Type: Administrative Modification
Permit Description: A direct final PTIO (P0105247) was issued on 10/8/09 involving the modification of two coating operations. The PTIO should have been issued as a draft action as part of establishing federally enforceable requirements. The purpose of this administrative modification is to result in the draft issuance of the above mentioned modification.
Facility ID: 0354000124
Facility Location: J & M MFG CO INC
284 RAILROAD ST,
Fort Recovery, OH 45846
Facility Description: Farm Machinery and Equipment 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 Donald Waltermeyer at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road or (419)352-8461. 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
J & M MFG CO INC

Facility ID: 0354000124
Permit Number: P0105723
Permit Type: Administrative Modification
Issued: 12/18/2009
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
J & M MFG CO INC

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Authorization

Facility ID: 0354000124
Application Number(s): M0000641
Permit Number: P0105723
Permit Description: A direct final PTIO (P0105247) was issued on 10/8/09 involving the modification of two coating operations. The PTIO should have been issued as a draft action as part of establishing federally enforceable requirements. The purpose of this administrative modification is to result in the draft issuance of the above mentioned modification.
Permit Type: Administrative Modification
Permit Fee: $0.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 12/18/2009
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:

J & M MFG CO INC
284 RAILROAD ST
Fort Recovery, OH 45846

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, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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: P0105723
Permit Description: A direct final PTIO (P0105247) was issued on 10/8/09 involving the modification of two coating operations. The PTIO should have been issued as a draft action as part of establishing federally enforceable requirements. The purpose of this administrative modification is to result in the draft issuance of the above mentioned modification.

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

Group Name: Coating Spray Booths 2 and 3

Emissions Unit ID:	**K011**
Company Equipment ID:	Spray Booth #2
Superseded Permit Number:	P0105247
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K012**
Company Equipment ID:	Spray Booth #3
Superseded Permit Number:	P0105247
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.
You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Coating Spray Booths 2 and 3: K011, K012,

EU ID	Operations, Property and/or Equipment Description
K011	Paint Spray Booth 2 - with 3.8 mmBtu/hr n.g. drying oven
K012	Paint Spray Booth 3 - with 3.8 mmBtu/hr n.g. drying oven

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

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

a. b)(1)h., d)(10), d)(11), d)(12), and e)(4).

(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)c, b)(2)a, c)(1), d)(1), d)(2), e)(1)a, e)(1)b, 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 3745-31-05(A)(3)(a)	38.5 lbs volatile organic compounds (VOC)/hr for coating operations (for emission units K011 and K012 individually) 0.57 tons VOC/month, 6.84 tons VOC /yr, for clean-up operations (for emissions units K011 and K012 combined) See b)(2)e.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)c.
c.	OAC rule 3745-31-05(D)	9.90 tons per rolling 12-month period for any individual hazardous air pollutants (HAPs); 20.0 tons per rolling 12-month period for any combination of HAPs (for emissions units K005, K011 and K012, and combined) [See b)(2)a.i.] 70.0 tons VOC/rolling 12-month period (for emissions units K011 and K012, combined) [See b)(2)a.ii and c)(1).]

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, for extreme performance coatings
e.	OAC rule 3745-17-11(B)	See b)(2)c. and b)(2)j.
f.	OAC rule 3745-17-07(A)	See b)(2)d. and b)(2)j.
g.	OAC rule 3745-17-11(C)	See b)(2)d., c)(2), and c)(3)
h.	ORC 3704.04(F) OAC rule 3745-114-01	See d)(10), d(11), d(12), and e)(1)d.

(2) Additional Terms and Conditions

a. The permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 9.90 tons per rolling 12-month period for any individual HAP, and 20.0 tons per rolling 12-month period for any combination of HAPs for emissions units K005, K011 and K012 combined (see also PTI 03-13936 regarding K005).

ii. 70.0 tons VOC per rolling 12-month period, from emissions units K011 and K012, combined [See c)(1)].

b. The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3)(a) are not applicable to the particulate emissions (PE) emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.

c. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to emissions of particulate matter less than or equal to 10 microns (PM10), nitrogen oxides (NOx) and carbon monoxide (CO) from this emissions unit since the calculated annual emissions for PM10, NOx and CO are less than ten tons per year.

NOx and CO are emitted as bi-products from the combustion of natural gas from drying oven operations. PM10 is emitted from the dry filtration system(s) controlling overspray from coating operations.

d. The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Auglaize County.

e. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational

restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan (SIP).

f. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11(B) is not applicable.

g. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).

h. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the natural gas combustion pollutants from the drying oven(s) from this air contaminant source(s) since the uncontrolled potential to emit for NO_X, CO, VOC, and PE are less than ten tons per year each.

i. The hourly VOC emission limitation represents the potential to emit for each coating operation. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with this emission limitation. It should be noted that the hourly VOC emission limitation does not include VOC emissions associated with the combustion of natural gas in the drying ovens. VOC emissions from natural gas combustion are negligible and are not addressed in the hourly emission limitation.

j. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP.

c) Operational Restrictions

(1) The maximum rolling 12-month quantity of VOC-containing materials employed in emissions units K011 and K012 combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{n} [(V_i)(G_i)\ (1\ \text{ton} / 2000\ \text{lbs})] <= 70.0$$

where,

M = the increment of the rolling 12-month period;
V_i = VOC content, in pounds per gallon, of each material employed
G_i = gallons used of each VOC containing material for the rolling 12-month period
n = total number of unique VOC containing materials employed

Federally enforceable limitations of: 9.90 tons of any individual HAP; 20.0 tons of any combination of HAP's; and 18.8 tons VOC; per rolling 12-month period, were initially established in a permit issued on April 22, 2003 and as such the facility has existing records of HAP and VOC emissions in lieu of establishing monthly HAP and VOC emissions restrictions for the first year of operation.

(2) The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations,

instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for all materials containing any HAP that are applied in emissions units K005, K011, and K012, combined:

a. the name and identification number/code of each HAP-containing material;

b. the name/identification of each individual HAP contained in each material applied [and identified in d)(1)a above] and the pound(s) of each HAP (per gallon of material applied);

c. the number of gallons of each HAP-containing material applied during the month;

d. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., the summation of d)(1)b times d)(1)c, for all the materials applied during the month, divided by 2,000 pounds;

e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of d)(1)d for all HAPs;

f. for each individual HAP, the total emissions during the rolling 12-month period, in ton(s); and

g. the total combined HAP emissions during the rolling 12-month period, in ton(s).

A 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 District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

Any clean-up materials used (for K005, K011, and/or K012) which contain HAPs must also be included in the above recordkeeping requirements and calculations.

(2) The permittee shall collect and record the following information each month for all coating and cleanup materials for emissions units K011 and K012, combined:

a. the company name or identification for each coating material employed;

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

c. the VOC content of each coating material employed, in pounds per gallon, as applied;

d. the VOC emission rate, in pounds, for each coating material employed [d)(2)b times d)(2)c];

e. the total VOC emission rate from all coating materials employed [summation of d)(2)d], in pounds or tons;

f. the name and identification number of each cleanup material employed;

g. the volume, in gallons, of each cleanup material employed;

h. the VOC content, in pounds per gallon, of each cleanup material employed; and

i. the total VOC emission rate, in pounds, from all cleanup materials employed {summation of [d)(2)g times d)(2)h] for all cleanup material}.

j. the total VOC emission rate from all VOC-containing materials employed [summation of d)(2)d + summation of d)(2)i], in pounds or tons; and

k. the rolling, 12-month VOC emission rates, i.e. rolling 12-month total of d)(2)j, in tons.

(3) The permittee, having chosen to demonstrate compliance with b)(1)d. through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

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

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

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

where:

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

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

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

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

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

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

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

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

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

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

This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

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

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

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

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

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

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

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

(9) The PTI application for this emissions unit group was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion

model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "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. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

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

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

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

   Toxic Contaminant: 2-Butoxyethyl Acetate
   TLV (mg/m3): 131
   Maximum Hourly Emission Rate: 11.3 lbs/hr
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 173
   MAGLC (ug/m3): 3130

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

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

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

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

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

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

(11) 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.

(12) 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 submit quarterly deviation (excursion) reports that identify:

a. any exceedances of the rolling 12-month HAP limitation specified in b)(1)b;

b. any exceedances of the rolling 12-month VOC limitation specified in b)(1)b;

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

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

(2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of non-complying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

(3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

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

a. Emission Limitation:
38.5 lbs VOC /hr for coating operations (for emission units K011 and K012 individually)

Applicable Compliance Method:
The hourly allowable VOC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum

hourly coatings usage rate (11.0 gallons per hour) by the maximum allowable VOC content of the coating (3.5 pounds per gallon).

b. Emission Limitation:
3.5 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements as specified in d)(3).

c. Emission Limitation:
0.57 tons VOC /month, 6.84 tons VOC /yr, for clean-up operations (for emissions units K011 and K012 combined)

Applicable Compliance Method:
Compliance with the monthly limit shall be based on the record keeping requirements as specified in d)(2).

The annual allowable VOC limitation was developed by multiplying the monthly limitation by 12, and then dividing by 2000. Therefore, as long as compliance with the monthly limitation is shown, compliance with the annual limitation shall be assumed.

d. Emission Limitation:
9.90 tons per rolling 12-month period for any individual HAPs; 20.0 tons per rolling 12-month period for any combination of HAPs (for emissions units K011, K012, and K005, combined)

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements as specified in d)(1).

e. Emission Limitation:
70.0 tons VOC/rolling 12-month period (for emissions units K011 and K012, combined)

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements as specified in d)(2).

(2) Formulation data or US EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the VOC content of materials.

g) Miscellaneous Requirements

(1) None.