State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
FRANKLIN COUNTY

Street Address:
122 S. Front Street

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

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 01-08854
Fac ID: 0125073054
DATE: 10/21/2004

Suburban Steel Supply Company LLC
Mark DeBellis
202 Township Road
Pataskala, OH 43062

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

Michael W. Ahern

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

cc: **USEPA** **CDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install		**Issue Date:**	**10/21/2004**
Terms and Conditions		**Effective Date:**	**10/21/2004**

FINAL PERMIT TO INSTALL 01-08854

Application Number:	01-08854
Facility ID:	0125073054
Permit Fee:	**$600**
Name of Facility:	Suburban Steel Supply Company LLC
Person to Contact:	Mark DeBellis
Address:	202 Township Road Pataskala, OH 43062

Location of proposed air contaminant source(s) [emissions unit(s)]:
1900 Deffenbaugh
Gahanna, **Ohio**

Description of proposed emissions unit(s):
Paint shop.

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

Part I - GENERAL TERMS AND CONDITIONS

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, 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 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 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

Pollutant	Tons Per Year
PE	53.6
VOC	58.9
HAP	4.9
HAPs	16.0

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F001 - Paved and unpaved roadways and parking areas	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 53.6 tons/yr. Visible particulate emissions (VE) shall not exceed one minute during any 60-minute period from the paved roadways and parking areas. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust from the paved roadways and parking areas shall be implemented. VEs shall not exceed 3 minutes during any 60-minute period from the unpaved roadways and parking areas. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust from the unpaved roadways and parking areas shall be implemented.

2. Additional Terms and Conditions

2.a All paved and unpaved roadways and parking areas at this facility are subject to the

above-mentioned requirements.

2.b The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall treat all paved roadways and parking areas by sweeping and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.c The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall treat all unpaved roadways and parking areas by watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.d The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

2.e Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.

2.f The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

2.g Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being

transported.

2.h Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of all roadways and parking areas on a weekly basis.

2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

4. The permittee shall maintain records of the following information:

   a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

   b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

   c. the dates the control measures were implemented; and

   d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 4.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify any of the following occurrences:

   a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

   b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following method:

   a. Emission Limitation:
   VEs shall not exceed one minute during any 60-minute period from the paved roadways and parking areas.

   Applicable Compliance Method:
   If required, compliance with the visible emission limitation for the paved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

   b. Emission Limitation:
   VEs shall not exceed 3 minutes during any 60-minute period from the unpaved roadways and parking areas.

Applicable Compliance Method:
If required, compliance with the visible emission limitation for the unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

c. Emission Limitation:
PE shall not exceed 53.6 tons per year.

Applicable Compliance Method:
Compliance shall be determined by summing the emissions from the plant road, yard, front lot and rear lot. The emission factor for plant roads of 7.3 lb PE/VMT, derived from AP-42, 13.2.2, 12/03, should be multiplied by the maximum VMT (PTI application, 04/02/04) of 1175.19 VMT/yr and by the control efficiency (1.0-0.50). The emission factor for the yard of 4.69 lb PE/VMT, derived from AP-42, 13.2.2, 12/03, should be multiplied by the maximum VMT (PTI application, 04/02/04) of 43,800 VMT/yr and by the control efficiency (1.0-0.50). The emission factor for the front lot of 0.1122 lb PE/VMT, derived from AP-42, 13.2.2, 12/03, should be multiplied by the maximum VMT (PTI application, 04/02/04) of 691.29 VMT/yr. The emission factor for the back lot of 0.1122 lb PE/VMT, derived from AP-42, 13.2.2, 12/03, should be multiplied by the maximum VMT (PTI application, 04/02/04) of 1382.58 VMT/yr.

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K001 - Paint shop for coating miscellaneous metal parts	OAC rule 3745-31-05(A)(3)	VOC emissions shall not exceed 8.75 lbs/hr, excluding cleanup and 39.1 tons/yr, including cleanup. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(d) and 3745-35-07(B).
	OAC rule 3745-21-09(U)(1)(d)	The maximum coating content shall not exceed 3.5 lbs VOC per gallon, excluding water and exempt solvents for coatings dried at temperatures not exceeding 200 degrees Fahrenheit (daily volume-weighted average).
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V operating permit requirements)	See Part III.A.2.b, B.1, B.2, and B.5 below.

2. Additional Terms and Conditions

2.a The 8.75 lbs/hr, excluding cleanup and 39.1 tons/yr, including cleanup emission limitations were written to reflect the potential to emit of this emissions unit based upon a daily calculation of the daily volume-weighted average VOC content emissions limitation. Therefore, additional monitoring, record keeping and reporting requirements are not necessary to demonstrate compliance with these emissions limitations.

2.b The total allowable emissions from emission units K001 (Paint shop for coating miscellaneous metal parts) and K002 (Miscellaneous metal parts coating in the yard) combined shall not exceed 58.9 tons VOC per rolling, 12-month summation, 4.9 tons HAP per rolling, 12-month summation and 16.0 tons combined HAPs, per rolling, 12-month summation.

B. Operational Restrictions

1. The maximum coating content shall not exceed 3.5 lbs VOC per gallon, excluding water and exempt solvents, 0.25 lbs HAP per gallon and 0.91 lbs combined HAPs per gallon.

2. The maximum cleanup content shall not exceed 6.75 lbs VOC per gallon, excluding water and exempt solvents, 2.48 lbs HAP per gallon and 3.54 lbs combined HAPs per gallon.

3. The maximum annual coating usage for emission units K001 and K002 combined shall not exceed 32,300 gallons.

4. The maximum annual cleanup usage for emissions units K001 and K002 combined shall not exceed 720 gallons.

5. The maximum annual coating usage for emission units K001 and K002 combined shall not exceed 32,200 gallons , and the maximum cleanup usage for emission units K001 and K002 combined shall not exceed 720 gallons based upon a rolling, 12-month summation of the coating and cleanup usage figures.

   To ensure enforceability during the first 12 calendar months of operation upon start up of either emission units K001 and K002 , the permittee shall not exceed the coating and cleanup usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage	Maximum Allowable Cumulative Cleanup Usage
1	3,400	85
1-2	6,800	170
1-3	10,200	255
1-4	13,600	340
1-5	17,000	425
1-6	20,400	510
1-7	23,800	595

1-8	27,200	680
1-9	28,500	690
1-10	29,800	700
1-11	31,100	710
1-12	32,300	720

After the first 12 calendar months of operation upon start up of either emission units K001 and K002, compliance with the annual coating and cleanup usage limitations shall be based upon a rolling, 12-month summation of the coating and cleanup usage figures.

6. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit K001:

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

   b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and

   c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.

2. The permittee shall collect and record the following information each month for emission units K001 and K002 combined:

   a. the name and identification of each coating, as applied;
   b. the individual VOC content for each coating in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied;
   c. the individual HAP[1] content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
   d. the total combined HAP content for each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from c);
   e. the number of gallons of each coating employed;
   f. during the first 12 calendar months of operation upon start up of either emission units K001 and K002, the cumulative monthly coating usage;
   g. beginning after the first 12 calendar months of operation upon start up of either emission units K001 and K002; the cumulative rolling, 12-month summation of the coating usage

figures;

h. the name and identification of each cleanup material employed;

i. the individual VOC content for each cleanup material in pounds of VOC per gallon of cleanup material, excluding water and exempt solvents, as applied;

j. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;

k. 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 i);

l. the number of gallons of each cleanup material employed;

m. during the first 12 calendar months of operation upon start up of either emission units K001 and K002, the cumulative monthly cleanup material usage;

n. beginning after the first 12 calendar months of operation upon start up of either emission units K001 and K002; the cumulative rolling, 12-month summation of the cleanup material usage figures;

o. the summation of VOC emissions, in tons (the sum of b times f for each coating and the sum of i times m for each cleanup material);

p. the total VOC emissions for from all coating and cleanup material in tons per rolling, 12-month period (the sum of b times g for each coating and the sum of i times n for each cleanup material);

q. 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 c times g for each coating and the sum of i times n for each cleanup material); and

r. 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 d times g for each coating plus the sum of k times n for each cleanup material).

[1]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 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.

3. 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.

4. The permit to install for this emissions unit (K001 and K002) was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model (or other Ohio EPA approved model). The predicted 1-hour maximum

ground-level concentration from the use of the ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant:1,2,4-Trimethylbenzene
TLV (mg/m3): 122.8
Maximum Hourly Emission Rate (lbs/hr): K001-0.331; K002-0.126
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.15
MAGLC (ug/m3):2.92

Pollutant: Aliphatic Hydrocarbon
TLV (mg/m3):1190.2
Maximum Hourly Emission Rate (lbs/hr): K001-7.31; K002-0.00
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 2.84
MAGLC (ug/m3):28.34

Pollutant: VM&P Naphtha
TLV (mg/m3): 1190.2
Maximum Hourly Emission Rate (lbs/hr): K001-7.628; K002-24.409
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 27.54
MAGLC (ug/m3):28.34

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 still 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 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.).

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), 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 its 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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying 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.

2. The permittee shall notify the 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 the Central District Office within 30 days after the event occurs.

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following for emission units K001 and K002 combined:

   a. the coating VOC, HAP and/or HAPs content limitations;
   b. the cleanup VOC, HAP and/or HAPs content limitations;
   c. for the first 12 calendar months of operation following start up of either emission units K001 and K002, all exceedances of the maximum allowable cumulative coating usage levels;
   d. for the first 12 calendar months of operation following start up of either emission units K001 and K002, all exceedances of the maximum allowable cumulative cleanup usage levels;
   e. beginning after the first 12 calendar months of operation upon start up of either emission units K001 and K002,the rolling, 12-month coating usage limitation;
   f. beginning after the first 12 calendar months of operation upon start up of either emission units K001 and K002,the rolling, 12-month cleanup usage limitation; and
   g. the rolling, 12-month VOC, HAP and HAPs emission limitations.

   These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).

E. Testing Requirements

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

   a. Emission Limitation:
      3.5 pounds VOC per gallon of coating, excluding water and exempt solvents
      0.25 lbs HAP per gallon of coating

0.91 lbs combined HAPs per gallon of coating
6.75 lbs VOC per gallon of cleanup material, excluding water and exempt solvents
2.48 lbs HAP per gallon of cleanup
3.54 lbs combined HAPs per gallon of cleanup

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.1. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A, Appendix A,cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating and cleanup materials to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

b. Emission Limitation:
VOC emissions shall not exceed 8.75 lbs/hr, excluding cleanup.

Applicable Compliance Method:
Compliance shall be demonstrated by multiplying the maximum coating rate of 2.5 gallons per hour (PTI application submitted 04/02/04) by the maximum VOC content of 3.5 lbs/gal.

c. Emission Limitation:
VOC emissions shall not exceed 39.1 tons/yr, including cleanup.

Applicable Compliance Method:
Compliance shall be demonstrated by summing the maximum coating and cleanup emissions. Maximum coating emissions shall be demonstrated by multiplying the maximum short term emission rate of 8.75 lbs/hr by 8760 hrs/yr and dividing by 2000 lbs/ton. Maximum cleanup emissions shall be demonstrated by multiplying the maximum annual cleanup usage of 250 gallons (PTI application submitted 04/02/04) by the maximum VOC content of 6.75 lbs/gal and dividing by 2000 lbs/ton.

d. Emission Limitation:
The total allowable emissions from emission units K001 (Paint shop for coating miscellaneous metal parts) and K002 (Miscellaneous metal parts coating in the yard) combined shall not exceed 58.9 tons VOC per rolling, 12-month summation, 4.9 tons HAP per rolling, 12-month summation and 16.0 tons combined HAPs, per rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be demonstrated by recordkeeping requirements found in Section C.1 above.

e. Emission Limitation:
The maximum annual coating usage for emission units K001 and K002 combined shall not exceed 32,200 gallons , and the maximum cleanup usage for emission units K001 and K002 combined shall not exceed 720 gallons based upon a rolling, 12-month summation of the coating and cleanup usage figures.

Applicable Compliance Method:
Compliance shall be demonstrated by recordkeeping requirements found in Section C.1 above.

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K002 - Miscellaneous metal parts coating in the yard	OAC rule 3745-31-05(A)(3)	VOC emissions shall not exceed 28.0 lbs/hr, excluding cleanup materials and 123.8 tons/yr, including cleanup materials. The requirements of this rule also include compliance with the requirements of OAC rules OAC rule 3745-21-09(U)(1)(d) and 3745-35-07(B).
	OAC rule 3745-21-09(U)(1)(d)	The maximum coating content shall not exceed 3.5 lbs VOC per gallon, excluding water and exempt solvents for coatings dried at temperatures not exceeding 200 degrees Fahrenheit (daily volume-weighted average).
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V permit operating requirements)	See Part III.A.2.b, B.1, B.2 and B.5 below.

2. Additional Terms and Conditions

2.a The 28.0 lbs/hr, excluding cleanup and 123.8 tons/yr, including cleanup emission limitations were written to reflect the potential to emit of this emissions unit based upon a daily calculation of the daily volume-weighted average VOC content emissions limitation. Therefore, additional monitoring, record keeping and reporting requirements are not necessary to demonstrate compliance with these emission limitations.

2.b The total allowable emissions from emission units K001 (Paint shop for coating miscellaneous metal parts) and K002 (Miscellaneous metal parts coating in the yard) combined shall not exceed 58.9 tons VOC per rolling, 12-month summation, 4.9 tons HAP per rolling, 12-month summation and 16.0 tons combined HAPs, per rolling, 12-month summation.

B. Operational Restrictions

1. The maximum coating content shall not exceed 3.5 lbs VOC per gallon, excluding water and exempt solvents, 0.25 lbs HAP per gallon and 0.91 lbs combined HAPs per gallon.

2. The maximum cleanup content shall not exceed 6.75 lbs VOC per gallon, excluding water and exempt solvents, 2.48 lbs HAP per gallon and 3.54 lbs combined HAPs per gallon.

3. The maximum annual coating usage for emission units K001 and K002 combined shall not exceed 32,300 gallons.

4. The maximum annual cleanup usage for emissions units K001 and K002 combined shall not exceed 720 gallons.

5. The maximum annual coating usage for emission units K001 and K002 combined shall not exceed 32,200 gallons , and the maximum cleanup usage for emission units K001 and K002 combined shall not exceed 720 gallons based upon a rolling, 12-month summation of the coating and cleanup usage figures.

   To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the coating and cleanup usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage	Maximum Allowable Cumulative Cleanup Usage
1	3,400	85
1-2	6,800	170
1-3	10,200	255
1-4	13,600	340
1-5	17,000	425
1-6	20,400	510
1-7	23,800	595
1-8	27,200	680

1-9	28,500	690
1-10	29,800	700
1-11	31,100	710
1-12	32,300	720

After the first 12 calendar months of operation, compliance with the annual coating and cleanup usage limitations shall be based upon a rolling, 12-month summation of the coating and cleanup usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the line:

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

   b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and

   c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.

2. The permittee shall collect and record the following information each month for emission units K001 and K002 combined:

   a. the name and identification of each coating, as applied;
   b. the individual VOC content for each coating in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied;
   c. the individual HAP[1] content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
   d. the total combined HAP content for each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from c);
   e. the number of gallons of each coating employed;
   f. during the first 12 calendar months of operation upon start up of either emission units K001 and K002, the cumulative monthly coating usage;
   g. beginning after the first 12 calendar months of operation upon start up of either emission units K001 and K002; the cumulative rolling, 12-month summation of the coating usage figures;
   h. the name and identification of each cleanup material employed;
   i. the individual VOC content for each cleanup material in pounds of VOC per gallon of cleanup material, excluding water and exempt solvents, as applied;

j. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
j. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
k. 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 i);
l. the number of gallons of each cleanup material employed;
m. during the first 12 calendar months of operation upon start up of either emission units K001 and K002, the cumulative monthly cleanup material usage;
n. beginning after the first 12 calendar months of operation upon start up of either emission units K001 and K002; the cumulative rolling, 12-month summation of the cleanup material usage figures;
o. the summation of VOC emissions, in tons (the sum of b times f for each coating and the sum of i times m for each cleanup material);
p. the total VOC emissions for from all coating and cleanup material in tons per rolling, 12-month period (the sum of b times g for each coating and the sum of i times n for each cleanup material);
q. 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 c times g for each coating and the sum of i times n for each cleanup material); and
r. 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 d times g for each coating plus the sum of k times n for each cleanup material).

[1]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 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.

3. The permit to install for this emissions unit (K001 and K002) was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant:1,2,4-Trimethylbenzene

TLV (mg/m3): 122.8
Maximum Hourly Emission Rate (lbs/hr): K001-0.331; K002-0.126
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.15
MAGLC (ug/m3):2.92

Pollutant: Aliphatic Hydrocarbon
TLV (mg/m3):1190.2
Maximum Hourly Emission Rate (lbs/hr): K001-7.31; K002-0.00
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 2.84
MAGLC (ug/m3):28.34

Pollutant: VM&P Naphtha
TLV (mg/m3): 1190.2
Maximum Hourly Emission Rate (lbs/hr): K001-7.628; K002-24.409
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 27.54
MAGLC (ug/m3):28.34

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 still 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit, coating application method or exhaust parameters.

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification

definition (other than (VV)(1)(a)(ii)), 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 its 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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying 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.

2. The permittee shall notify the 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 the Central District Office within 30 days after the event occurs.

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following for emission units K001 and K002 combined:

   a. the coating VOC, HAP and/or HAPs content limitations;
   b. the cleanup VOC, HAP and/or HAPs content limitations;
   c. for the first 12 calendar months of operation following start up of either emission units K001 and K002, all exceedances of the maximum allowable cumulative coating usage levels;
   d. for the first 12 calendar months of operation following start up of either emission units K001 and K002, all exceedances of the maximum allowable cumulative cleanup usage levels;
   e. beginning after the first 12 calendar months of operation upon start up of either emission

units K001 and K002,the rolling, 12-month coating usage limitation;

f. beginning after the first 12 calendar months of operation upon start up of either emission units K001 and K002,the rolling, 12-month cleanup usage limitation; and

g. the rolling, 12-month VOC, HAP and HAPs emission limitations.

These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).

E. Testing Requirements

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

a. Emissions Limitations:
3.5 pounds VOC per gallon of coating, excluding water and exempt solvents
0.25 lbs HAP per gallon of coating
0.91 lbs combined HAPs per gallon of coating
6.75 lbs VOC per gallon of cleanup material, excluding water and exempt solvents
2.48 lbs HAP per gallon of cleanup
3.54 lbs combined HAPs per gallon of cleanup

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.1. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating and cleanup materials to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

b. Emission Limitation:
VOC emissions shall not exceed 28.0 lbs/hr, excluding cleanup.

Applicable Compliance Method:
Compliance shall be demonstrated by multiplying the maximum coating rate of 8.0 gallons per hour (PTI application submitted 04/02/04) by the maximum VOC content of 3.5 lbs/gal.

c. Emission Limitation:
VOC emissions shall not exceed 123.8 tons/yr, including cleanup.

Applicable Compliance Method:
Compliance shall be demonstrated by summing the maximum coating and cleanup emissions. Maximum coating emissions shall be demonstrated by multiplying the maximum short term emission rate of 28.0 lbs/hr by 8760 hrs/yr and dividing by 2000 lbs/ton. Maximum cleanup emissions shall be demonstrated by multiplying the maximum annual cleanup usage of 350 gallons (PTI application submitted 04/02/04) by the maximum VOC content of 6.75 lbs/gal and dividing by 2000 lbs/ton.

d. Emission Limitation:
The total allowable emissions from emission units K001 (Paint shop for coating miscellaneous metal parts) and K002 (Miscellaneous metal parts coating in the yard) combined shall not exceed 58.9 tons VOC per rolling, 12-month summation, 4.9 tons HAP per rolling, 12-month summation and 16.0 tons combined HAPs, per rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be demonstrated by recordkeeping requirements found in Section C.1 above.

e. Emission Limitation:
The maximum annual coating usage for emission units K001 and K002 combined shall not exceed 32,200 gallons , and the maximum cleanup usage for emission units K001 and K002 combined shall not exceed 720 gallons based upon a rolling, 12-month summation of the coating and cleanup usage figures.

Applicable Compliance Method:
Compliance shall be demonstrated by recordkeeping requirements found in Section C.1 above.

F. Miscellaneous Requirements

None