



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

6/4/2010

Susan Croasmun
MICROPOISE MEASUREMENTS SYSTEMS LLC
PO BOX 1869
AKRON, OH 44309

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1677010265
Permit Number: P0106337
Permit Type: Renewal
County: Summit

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: ARAQMD



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
MICROPOISE MEASUREMENTS SYSTEMS LLC**

Facility ID: 1677010265
Permit Number: P0106337
Permit Type: Renewal
Issued: 6/4/2010
Effective: 6/4/2010
Expiration: 6/4/2015



Division of Air Pollution Control
Permit-to-Install and Operate
for
MICROPOISE MEASUREMENTS SYSTEMS LLC

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Authorization

Facility ID: 1677010265
Application Number(s): A0039328
Permit Number: P0106337
Permit Description: Renewal permit for paint booth and diesel-fired electric generator.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 6/4/2010
Effective Date: 6/4/2010
Expiration Date: 6/4/2015
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

MICROPOISE MEASUREMENTS SYSTEMS LLC
1624 ENGLEWOOD DRIVE
AKRON, OH 44305

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:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

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: P0106337
Permit Description: Renewal permit for paint booth and diesel-fired electric generator.

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

Emissions Unit ID:	B004
Company Equipment ID:	CAT Generator 1
Superseded Permit Number:	16-02470
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K001
Company Equipment ID:	Devilbiss Paint Booth
Superseded Permit Number:	16-02289
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. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. 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 Akron Regional Air Quality Management District 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 submitting¹ 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 emissions 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

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

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. B004, CAT Generator 1

Operations, Property and/or Equipment Description:

Caterpillar Model No. 3304B diesel-fired electric generator - CAT Generator 1.

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. g)(1).

(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)b., c)1), c)(2), d)(2), e)(2) and f)(1)i.

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)	<p>Nitrogen oxide (NOx) emissions shall not exceed 3.67 pounds per hour.</p> <p>Carbon monoxide (CO) emissions shall not exceed 1.05 pounds per hour.</p> <p>Organic compounds (OC) emissions shall not exceed 0.06 pound per hour.</p> <p>Sulfur dioxide (SO2) emissions shall not exceed 0.06 pound per hour.</p> <p>The total combined hazardous air pollutants (HAPs) emissions shall not exceed 0.06 pound per hour.</p> <p>The particulate emissions (PE) from the engine's exhaust shall not exceed 0.09 pound per million Btu of actual heat input.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>PE shall not exceed 0.10 pound per hour.</p> <p>Visible PE from any stack shall not exceed 10 percent opacity, as a six-minute average.</p> <p>See b)(2) a. below.</p>
b.	OAC rule 3745-31-05(D)	<p>NOx emissions shall not exceed 6.42 tons per year, based upon a rolling, 12-month summation.</p> <p>CO emissions shall not exceed 1.84 tons per year, based upon a rolling, 12-month summation.</p> <p>OC emissions shall not exceed 0.11 ton per year, based upon a rolling, 12-month summation.</p> <p>SO2 emissions shall not exceed 0.11 ton per year, based upon a rolling, 12-month summation.</p> <p>The total combined HAPs emissions shall not exceed 0.11 ton per year, based upon a rolling, 12-month summation.</p> <p>PE shall not exceed 0.18 ton per year, based upon a rolling, 12-month summation.</p> <p>See c)(1) and c)(2) below.</p>
c.	OAC rule 3745-17-07(A)	The emission limitation based on this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
d.	OAC rule 3745-17-11(B)(5)(a)	The emission limitation based on this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
e.	OAC rule 3745-18-06(B)	This emissions unit is exempt from OAC rule 3745-18-06(G) because the stationary internal combustion engine has a rated heat input capacity less than 10 MM Btu per hour total rated capacity.
f.	OAC rule 3745-23-06(B)	See b)(2)b. below.
g.	OAC rule 3745-21-08(B)	See b)(2)c. below.

(2) Additional Terms and Conditions

- a. The hourly NO_x, CO, OC, SO₂, and total combined HAPs emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.
- b. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On February 14, 2005, OAC rule 3745-23-06 was rescinded; therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the U.S. EPA approves the revision to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- c. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

c) Operational Restrictions

- (1) This emissions unit shall be operated with diesel fuel with a sulfur content less than or equal to 0.05% by weight.
- (2) The maximum annual operating hours for this emissions unit shall not exceed 3500, based upon a rolling, 12-month summation of the operating hours.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain a record of the sulfur content of each shipment of diesel fuel received for burning in this emissions unit.
- (2) The permittee shall maintain monthly records of the following information:
 - a. the operating hours for each month; and
 - b. the rolling, 12-month summation of the operating hours.

e) Reporting Requirements

- (1) The permittee shall identify each day when a fuel that did not meet the requirements of c)(1) above was burned in this emissions unit in the annual permit evaluation report (PER).
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

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

- (3) Annual 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

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) above shall be determined in accordance with the following method(s):
 - a. Emission Limitation:

NOx emissions shall not exceed 3.67 pounds per hour.

Applicable Compliance Method:

The hourly allowable NOx emission limitation above was established based on the results (1664 grams/hr) of testing at 100% load.

If required, the permittee shall demonstrate compliance with the hourly allowable NO_x emission limitation based on the results of emission testing conducted in accordance with Methods 1-4, and 7, 7A, 7C, or 7E, as appropriate, of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

CO emissions shall not exceed 1.05 pounds per hour.

Applicable Compliance Method:

The hourly allowable CO emission limitation above was established based on the results (476 grams/hr) of testing at 100% load.

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

c. Emission Limitation:

OC emissions shall not exceed 0.06 pound per hour.

Applicable Compliance Method:

The hourly allowable OC emission limitation above was established based on the results (27 grams/hr) of testing at 100% load.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

d. Emission Limitation:

SO₂ emissions shall not exceed 0.06 pound per hour.

Applicable Compliance Method:

The hourly allowable SO₂ emission limitation above was established based on multiplying the emission factor* of 0.007 lb SO₂/gallon of oil by the maximum hourly number of gallons of oil used (9 gallons/hr).

If required, the permittee shall demonstrate compliance with the hourly allowable SO₂ emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 6 or 6C, as appropriate, of 40 CFR Part 60, Appendix A.

* This emission factor was developed based on multiplying the maximum sulfur content in oil (0.0005) by the density of oil (7 lbs/gallon) and by 1 gallon, and then by 2 (for every pound of sulfur burned, 2 pounds of SO₂ are produced).

e. Emission Limitation:

The total combined HAPs* emissions shall not exceed 0.06 pound per hour.

Applicable Compliance Method:

The hourly allowable total combined HAPs emission limitation above was established based on the results (27 grams/hr) of testing at 100% load.

If required, the permittee shall demonstrate compliance with the hourly allowable total combined HAPs emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

* All OC/VOCs are assumed to be HAPs.

f. Emission Limitation:

The PE from the engine's exhaust shall not exceed 0.09 pound per million Btu of actual heat input.

Applicable Compliance Method:

The lb PE/mmBtu allowable limitation above was established based on the results [45 grams/hr (0.099 lb/hr)] of testing at 100% load, and the maximum heat input (1.16 mmBtu/hr).*

If required, the permittee shall demonstrate compliance with the allowable pound of PE per million Btu of actual heat input emission limitation based on the results of emission testing conducted in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

* $0.09 \text{ lb/mmBtu} = 0.099 \text{ lb/hr}$ divided by the maximum heat input (1.16 mmBtu/hr)**

** The maximum heat input was calculated based on multiplying the oil heat content (18,390 Btu/lb) by the hourly maximum number of gallons of oil used (9 gallons/hr) and by the density of oil (7 lbs/gallon), and then dividing by 1,000,000.

g. Emission Limitation:

PE shall not exceed 0.10 pound per hour.

Applicable Compliance Method:

The hourly allowable PE limitation above was established based on the results (45 grams/hr) of testing at 100% load.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation based on the results of emission testing conducted in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

h. Emission Limitation:

Visible PE from any stack shall not exceed 10% opacity as a six-minute average.

Applicable Compliance Method:

Compliance with the visible PE limitation shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-03(B)(1).

i. Emission Limitations:

NO_x emissions shall not exceed 6.42 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

CO emissions shall not exceed 1.84 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

OC emissions shall not exceed 0.11 ton per year, based upon a rolling, 12-month summation of the monthly emissions.

SO₂ emissions shall not exceed 0.11 ton per year, based upon a rolling, 12-month summation of the monthly emissions.

The total combined HAPs emissions shall not exceed 0.11 ton per year, based upon a rolling, 12-month summation of the monthly emissions.

PE shall not exceed 0.18 ton per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual allowable emission limitations above were determined by multiplying the hourly allowable emission limitation by the maximum annual allowable operating hours (3500 hours per year, as a rolling, 12-month summation), and then dividing by 2000. Therefore, as long as compliance with the hourly allowable emission limitations and the annual allowable operating hours are maintained, compliance with the annual allowable emission limitations shall be assumed.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.



2. K001, Devilbiss Paint Booth

Operations, Property and/or Equipment Description:

Devilbiss Paint Booth

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. d)(5).
 - (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)b., c)(1), c)(2), d)(2), d)(4), e)(2), f)(1)d., f)(1)e., and f)(1)f.
- 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)	<p>Volatile Organic compound (VOC) emissions shall not exceed 4.18 pounds per hour and 11.7 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-21-09(U)(1)(d).</p> <p>See b)(2)a. below.</p>
b.	OAC rule 3745-21-09(U)(1)(d)	The permittee shall not employ any coating that exceeds 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average.
c.	OAC rule 3745-31-05(D)	The total facility-wide VOC emissions shall not exceed 49.9 tons per year, based on a rolling 12-month summation of the monthly emissions.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)b. below

(2) Additional Terms and Conditions

- a. The hourly VOC emission limitation was developed based on the potential to emit at the maximum coating application rate. Therefore, record keeping for hourly VOC emission limitation is not necessary.
- b. The total individual hazardous air pollutant (HAP)* emissions from this facility shall not exceed 9.9 tons per rolling 12-month period.

The total combined HAPs emissions from this facility shall not exceed 24.0 tons per rolling 12-month period for combined HAP emissions.

*The HAPs employed at this facility include xylene, ethyl benzene, toluene, and methyl isobutyl ketone, although other HAPs may be employed. 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 adhesive/coatings and clean up materials. This information does not have to be kept on a line-by-line basis.

c) Operational Restrictions

- (1) The permittee has agreed to accept limitations on daily operating hours to keep the facility-wide xylene emission rate to less than 9.9 tons per year.
- (2) The permittee shall not operate this emissions unit for more than 16 hours in any day, nor use more than 16.0 gallons of coating per day based on the maximum coating application rate of 1 gallon of coating applied per hour.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee, having chosen to demonstrate compliance by means of a daily volume-weighted average VOC content, shall collect and record the following information each day for the coating line:
 - a. the name and identification number of each coating, as applied;
 - b. the mass of VOC per volume of coating (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 $C_{VOC,2}$, as follows:

n

n

$$(C_{VOC,2})_A = \frac{\sum_{i=1} C_{VOC,2i} L_{Ci} (V_{Si} + V_{VOCi})}{\sum_{i=1} L_{Ci} (V_{Si} + V_{VOCi})}$$

where:

$(C_{VOC,2})_A$ is the daily volume-weighted average VOC content of all coatings, as applied.

$C_{VOC,2}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

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

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

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

V_S = the 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.

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period "t".

L_C = liquid volume of coating employed during time period "t", in gallons of coating.

M_C = mass of coating employed during the time period "t", in pounds of coating.

i = subscript denoting a specific coating employed during time period "t".

n = total number of coatings employed during time period "t".

t = time period specified for the weighted average VOC content is per day and not included in the calculation.

- (2) The permittee shall collect and record the following information each day for the coating line:
 - a. the name and identification number of each adhesive/coating, as applied;
 - b. the volume, in gallons, of each adhesive/coating, as applied;
 - c. the total volume, in gallons, of all of the adhesives/coatings employed; and
 - d. the number of hours the emissions unit was in operation.
- (3) The permittee shall collect and record the following information for the purpose of determining annual VOC emissions for the coating line:
 - a. the name and identification number for each adhesive/coating, as applied;
 - b. the VOC content of each adhesive/coatings employed, in pounds of VOC per gallon of adhesive/coating, as applied;
 - c. the number of gallons of each adhesive/coating employed;
 - d. the name and identification number for each cleanup material employed;
 - e. the VOC content of each cleanup material employed, in pounds of VOC per gallon of cleanup material, as applied;
 - f. the number of gallons of each cleanup material employed; and
 - g. the total VOC emissions from all adhesives/coatings and cleanup materials, in pounds or tons (the sum of d)(3)b. times d)(3)c. for each adhesive/coating plus the sum of d)(3)e. times d)(3)f. for each cleanup material).
- (4) The permittee shall collect and record the following information for each month for the facility:
 - a. the name and identification number for each adhesive/coating, as applied;
 - b. the VOC content of each adhesive/coatings employed, in pounds of VOC per gallon of adhesive/coating, as applied;
 - c. the individual HAP content for each HAP of each adhesive/coating employed, in pounds of individual HAP per gallon of adhesive/coating, as applied;
 - d. the total combined HAP content for each HAP of each adhesive/coating employed, in pounds of combined HAPs per gallon, as applied (sum of all the individual HAP contents from d)(4)c.);

- e. the number of gallons of each adhesive/coating employed;
- f. the name and identification number for each cleanup material employed;
- g. the VOC content of each cleanup material employed, in pounds of VOC per gallon of cleanup material, as applied;
- h. the individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon of cleanup material, as applied;
- i. the total combined HAP content for each cleanup material employed, in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all the individual HAP contents from d)(4)h.);
- j. the number of gallons of each cleanup material employed;
- k. the total individual HAP emissions for each HAP from all adhesive/coatings and cleanup materials employed, in pounds or tons per month (for each HAP the sum of d)(4)c. times d)(4)e. for each adhesive/coatings plus the sum of d)(4)h. times d)(4)j. for each cleanup material);
- l. the total individual HAP emissions for each HAP from the entire facility, in pound or tons per month (i.e., d)(4)k plus $0.11^{*/12}$ plus $X^{**/12}$);
- m. the total individual HAP emissions for each HAP from the entire facility, in pounds or tons per rolling 12-month period;
- n. the total combined HAP emissions from all adhesive/coatings and cleanup materials employed, in pounds or tons per month (the sum of d)(4)d. times d)(4)e. for each adhesive/coatings plus the sum of d)(4)i. times d)(4)j. for each cleanup material);
- o. the total combined HAP emissions from the entire facility, in pound or tons per month (i.e., d)(4)n. plus $0.11^{*/12}$ plus $Y^{***/12}$);
- p. the total combined HAP emissions from all the entire facility, in pounds or tons per rolling 12-month period;
- q. the total VOC emissions from all adhesive/coatings and cleanup materials employed, in pounds or tons per month (the sum of d)(4)b. times d)(4)e. for each adhesive/coatings plus the sum of d)(4)g. times d)(4)j. for each cleanup material);
- r. the total VOC emissions from the entire facility, in pound or tons per month (i.e., d)(4)q. plus $0.11^{*/12}$ plus $Z^{****/12}$); and
- s. the total VOC emissions from the entire facility, in tons per rolling 12-month period.

*The restricted potential to emit for emissions unit B004.

** The annual potential to emit for each individual HAP for the emissions units exempt under OAC rule 3745-31-03 and OAC rule 3745-15-05 "De Minimis" air contaminant source exemption.

***The annual potential to emit for total combined HAPs for the emissions units exempt under OAC rule 3745-31-03 and OAC rule 3745-15-05 "De Minimis" air contaminant source exemption.

**** The annual potential to emit for VOC for the emissions units exempt under OAC rule 3745-31-03 and OAC rule 3745-15-05 "De Minimis" air contaminant source exemption.

- (5) The permit to install for this emissions unit (K001) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: Xylene

TLV (mg/m³): 434.19 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.06

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 570.7

MAGLC (ug/m³): 10,337

Pollutant: Ethyl Benzene

TLV (mg/m³): 434.19 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 0.51

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 140.5

MAGLC (ug/m³): 10,337

Pollutant: Methyl Amyl Ketone

TLV (mg/m³): 104.47 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.05

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 396.83

MAGLC (ug/m³): 2,487.6

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound 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 TLV value specified above;
- 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.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. 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 45 days after the exceedance occurs.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. any exceedance of the daily limitation on the hours of operation;
 - ii. any exceedance of the daily limitation on coating usage;
 - iii. all exceedances of the rolling, 12-month emission limitation for individual HAP (xylene);
 - iv. all exceedances of the rolling, 12-month emission limitation for total combined HAPs; and
 - v. all exceedances of the rolling, 12-month emission limitation for VOC.
 - b. the probable cause of each deviation (excursion).
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

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

- (3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the 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
- (4) Annual 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.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) and b)(2) above 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 as a daily volume-weighted average

Applicable Compliance Method:

Compliance with the VOC emission limitation above shall be demonstrated based on the record keeping requirements established in d)(1) above and the following: USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If an owner or operator determines that Method 24 or 24A in 40 CFR Part 60, Appendix A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A."

b. Emission Limitations:

4.18 pounds of VOC per hour

Applicable Compliance Method:

Compliance with the hourly VOC emission limitation above shall be demonstrated by multiplying the worst-case VOC content, in pounds of VOC per gallon of coating times the maximum hourly coating usage rate in gallon(s) per hour plus the worst-case VOC content, in pounds of VOC per gallon of cleanup material times the maximum hourly cleanup material usage rate in gallon(s) per hour.

c. Emission Limitations:

11.7 tons of VOC per year

Applicable Compliance Method:

Compliance with the annual VOC emission limitation above shall be demonstrated based on the record keeping requirements established in d)(3) above.

d. Emission Limitations

The total individual HAP emissions from this facility shall not exceed 9.9 tons per rolling 12-month period.



The total combined HAPs emissions from this facility shall not exceed 24.0 tons per rolling 12-month period for combined HAP emissions.

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be demonstrated based on the record keeping requirements established in d)(4) above.

e. Operational Restrictions:

16 hours of operation per day

16 gallons of coating employed per day

Applicable Compliance Method:

Compliance with the daily operational restrictions above shall be demonstrated based on the record keeping requirements established in d)(2) above.

f. Emission Limitation:

The total facility-wide VOC emissions shall not exceed 49.9 tons per year, based on a rolling 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance with the annual VOC facility wide emission limitation above shall be demonstrated based on the record keeping requirements established in d)(4) above.

g) Miscellaneous Requirements

(1) None