Ohio Environmental Protection Agency

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

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)

6/11/2010

Jeff Litteral
Southern Ohio Holding Organization LLC
2101 Kenskill Ave
Washington Court House, OH 43160

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0124010403
Permit Number: P0105882
Permit Type: Initial Installation
County: Fayette

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Record Herald. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

Michael W. Ahern

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

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

Fayette County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Southern Ohio Holding Organization LLC

Issue Date: 6/11/2010
Permit Number: P0105882
Permit Type: Initial Installation
Permit Description: Operation of a spray coating booth for plastic and miscellaneous metal parts.
Facility ID: 0124010403
Facility Location: Southern Ohio Holding Organization LLC
2202 Kenskill Avenue,
Washington Court House, OH 43160
Facility Description: Automotive Body, Paint, and Interior Repair and Maintenance

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Benjamin Halton at Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049 or (614)728-3778. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Permit Strategy Write-Up

1. Check all that apply:

   X Synthetic Minor Determination

   ___ Netting Determination

2. Source Description:

   Southern Ohio Holding Organization, LLC (SOHO) is an existing facility performing miscellaneous metal parts and plastics surface coating operations. The facility, installed in 2007, is located at 2202 Kenskill Avenue in Washington Courthouse, OH 43160.

3. Facility Emissions and Attainment Status:

   The facility has a physical limitation within the coating process with one spray booth resulting in a volumetric restriction of 16 gallons of coating a day. The facility is voluntarily restricting themselves to a volumetric restriction of 10 gallons per day and 40 gallons of coating per year. The facility is located in Fayette County, Ohio, which is in attainment for all criteria pollutants. The facility understands and is expecting to be permitted as a synthetic minor facility.

4. Source Emissions:

   Source emissions are PE, VOCs and HAPs. The single highest HAP is toluene. Source is subject to OAC 3745-31-05(A)(3), OAC 3745-17-11(B) until SIP changes are approved, OAC 3745-17-11(C) once SIP changes are approved and OAC 3745-17-07(B). Facility is not subject to 40 CFR 63.11169 – 63.11180 (Subpart HHHHHH) as the facility does not utilize MeCl, does not coat motor vehicles or mobile equipment and does not utilize coatings containing any target HAP as defined in 40 CFR 63.11180. The facility uses clearcoat, basecoat and primer coatings that have been thinned. The facility also has cleanup solvent.

   PTE

   Maximum throughput of coating is dependent upon type of coating being applied (different nozzle sizes for the coatings). PTE is determined using the information below.

	Flow rate	Flow rate	Paint Density	Paint Applied
	(oz/min)	(gal/hr)	(lb/gal) (from MSDS)	lb/hr
Clearcoat	4.2	1.97	7.18	14.14
Basecoat	0.82	0.38	8.59	3.30
Primer	2.85	1.34	10.17	13.59
Thinner			7.03	

VOC PTE

Wt% VOC (less exempt) obtained from the MSDS sheets for the coatings
Clearcoat – 96.1%
Basecoat – 74.5%
Primer – 45.1%

VOC lb/hr = Flow Rate * Paint Density * Wt% VOC (less exempt) from the coating

Clearcoat VOC = 1.97 gal/hr * 7.18 lb/gal * 96.1%
= 13.58 lb/hr

Baseoat VOC = 0.38 gal/hr * 8.59 lb/gal * 74.5%
= 2.46 lb/hr

Primer VOC = 1.34 gal/hr * 10.17 lb/gal * 45.1%
= 6.13 lb/hr

The facility thins each coating with up to 0.67 gal of thinner per gallon of coating. The normalizing calculation used throughout is:

Coating + Thinner VOC/PE/HAP/Tol= (lb VOC/PE/HAP/Tol /gal + lb VOC/PE/HAP/Tol Thinner/gal * 0.67 gal Thinner)/1.67 gal total (coating + thinner)

New VOC density using the normalizing equation above (worst case as applied):

Clearcoat VOC = [(7.18 lb clearcoat/gal * 96.1%VOC) + (7.03 lb thinner/gal * 77.5%VOC)*0.67 gal thinner] / 1.67 gallons of clearcoat and thinner
= 6.32 lb VOC/gal clearcoat as applied

Basecoat VOC = [(8.59 lb basecoat/gal * 74.5% VOC) + (7.03 lb thinner/gal * 77.5%VOC)*0.67 gal thinner] / 1.67 gallons of basecoat and thinner
= 6.02 lb VOC/gal basecoat as applied

Primer VOC = [(10.17 lb primer/gal *45.1% VOC) + (7.03 lb thinner/gal * 77.5%VOC)*0.67 gal thinner] / 1.67 gallons of primer and thinner
= 4.93 lb VOC/gal primer as applied

New PTE (as applied or with thinner)

Clearcoat VOC = 1.97 gal/hr * 6.32 lb/gal
= 12.44 lb/hr

Basecoat VOC = 0.38 gal/hr * 6.02 lb/gal
= 2.31 lb/hr

Primer VOC = 1.34 gal/hr * 4.93 lb/gal
= 6.59 lb/hr

The facility is accepting a voluntary volumetric restriction of 10 gal/day

Clearcoat VOC = 6.32 lb/gal * 10 gal/day
= 63.18 lb/day

Basecoat VOC = 6.02 lb/gal * 10 gal/day
= 60.19 lb/day

Primer VOC = 4.93 lb/gal * 10 gal/day
= 49.33 day

The facility is voluntarily restricting themselves to 40 gallons per year.
Clearcoat VOC = 40 gal/yr * 6.32 lb/gal * 1 ton/2000lb
= 0.13 tpy

Basecoat VOC = 40 gal/yr * 6.02 lb/gal * 1 ton/2000lb
= 0.12 tpy

Primer VOC = 40 gal/yr * 4.64 lb/gal * 1 ton/2000 lb
= 0.10 tpy

HAP
For detailed HAP calculations, see calculations spreadsheet attached to the permit.

The facility is accepting a voluntary volumetric restriction of 10 gal/day
Clearcoat HAP = 5.67 lb/gal * 10 gal/day
= 56.73 lb/day

Basecoat HAP = 2.47 lb/gal * 10 gal/day
= 24.67 lb/day

Primer HAP = 5.58 lb/gal * 10 gal/day
= 55.85 lb/day

The facility is voluntarily restricting themselves to 40 gallons per year.
Clearcoat HAP = 40 gal/yr * 5.67 lb/gal * 1 ton/2000 lb
= 0.11 tpy

Basecoat HAP= 40 gal/yr * 2.47 lb/gal * 1 ton/2000 lb
= 0.05 tpy

Primer HAP = 40 gal/yr * 5.58 lb/gal * 1 ton/2000 lb
= 0.11 tpy

Toluene
Toluene is the single highest HAP in all of the coatings. Using the same method as above, toluene emissions are provided below.

For detailed toluene calculations, see calculations spreadsheet attached to the permit.
The facility is accepting a voluntary volumetric restriction of 10 gal/day

Clearcoat Tol = 2.73 lb/gal *10 gal/day
= 27.32 lb/day

Basecoat Tol = 1.53 lb/gal * 10 gal/day
= 15.29 lb/day

Primer Tol = 3.96 lb/gal * 10 gal/day
= 39.65 lb/day

The facility is voluntarily restricting themselves to 40 gallons per year.
Clearcoat Toluene = 40 gal/yr * 2.73 lb/gal * 1 ton/2000 lb
= 0.05 tpy

Basecoat Toluene = 40 gal/yr * 1.53 lb/gal * 1 ton/2000 lb
= 0.03 tpy

Primer Toluene = 40 gal/yr * 3.96 lb/gal * 1 ton/2000 lb
= 0.08 tpy

PE
The facility has a 60% transfer efficiency.
Throughput * density * %solids * %transfer efficiency = PE

Clearcoat PE = 1.97 gal/hr * 7.18 lb/gal * 3.72% * 60%
= 0.32 lb/hr

Basecoat PE = 0.38 gal/hr * 8.59 lb/gal * 24.57% * 60%
= 2.11 lb/gal

Primer PE = 1.34 gal/hr * 10.17 lb/gal * 54.8% * 60%
= 4.48 lb/gal

The facility has a voluntary restriction of 10 gallons per day and 40 gal/yr.

PE = density * %solids * 10 gal/day (40 gal/yr * 1ton/2000 lbs)

Clearcoat PE = 2.67 lb/day or 0.01 tpy

Basecoat PE = 21.11 lb/day or 0.04 tpy

Primer PE = 55.73 lb/day or 0.11 tpy

BAT is this case is the building. Using RACM guidance document found on Ohio EPA's Web site (Section 2.1.3.4) for fugitive dust for transferring and conveying materials within a partial enclosure, the building will be considered as allowing for 70% efficiency of removal of PE.

PE = density * %solids * 10 gal/day (40 gal/yr * 1ton/2000 lbs) * (1-0.7)

Clearcoat PE = 0.801 lb/day or 0.01 tpy

Basecoat PE = 6.33 lb/day or 0.01 tpy

Primer PE = 16.72 lb/day or 0.03 tpy

5. Conclusion:

   Permit monitoring and recordkeeping, while maintaining compliance with other terms and conditions in the permit, should ensure compliance with applicable state and federal rules.

6. Please provide additional notes or comments as necessary:

   The facility is a minor source of emissions due to the physical limitations of the spray coating operations and the throughput of the facility. BAT is considered to be the facility building in this case.

   Air toxics modeling is not required as the facility is accepting federally enforceable restrictions limiting the potential to emit air toxics to less than 1.0 tons per year.

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

Pollutant	Tons Per Year
VOC	0.13
Total HAP	0.11
Single HAP (Toluene)	0.08
PE	0.03

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Southern Ohio Holding Organization LLC

Facility ID:	0124010403
Permit Number:	P0105882
Permit Type:	Initial Installation
Issued:	6/11/2010
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Southern Ohio Holding Organization LLC

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Authorization

Facility ID: 0124010403
Application Number(s): A0038918
Permit Number: P0105882
Permit Description: Operation of a spray coating booth for plastic and miscellaneous metal parts.
Permit Type: Initial Installation
Permit Fee: $400.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 6/11/2010
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Southern Ohio Holding Organization LLC
2202 Kenskill Avenue
Washington Court House, OH 43160

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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: P0105882
Permit Description: Operation of a spray coating booth for plastic and miscellaneous metal parts.

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

Emissions Unit ID:	**K001**
Company Equipment ID:	K001
Superseded Permit Number:	
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 Ohio EPA DAPC, Central District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.
If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.
You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] 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

[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).

while the emissions unit was in operation, for at least five years from the date the record was generated.
Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. K001, K001

Operations, Property and/or Equipment Description:

Automobile and auto parts spray booth with dry filtration

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), e)(3).

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

a. b)(1)a., b)(2)a., c)(1)., d)(1), d)(4)., e)(2)a.

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(D)	Volatile organic compound (VOC) emissions shall not exceed 63.18 lb/day and 0.13 tons per year, including both coatings and cleanup materials. Hazardous air pollutant (HAP) emissions shall not exceed 56.73 lb/day and 0.11 tons per year, including both coatings and cleanup materials. Toluene emissions shall not exceed 39.65 lb/day and 0.08 tons per year, including both coatings and cleanup materials. Particulate emissions (PE) shall not exceed 16.72 lb/day and 0.03 tons per year from coatings.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a. and c)(1). The requirements established pursuant to this rule also include the requirements of OAC rule 3745-17-11(B)(1) and OAC rule 3745-17-07(B)
b.	OAC rule 3745-21-09(U)	See b)(2)b.
c.	OAC rule 3745-17-11(B)(3)	The emissions limitation established by this rule is less stringent than the emissions limitation established by OAC 3745-31-05(D).
c.	OAC rule 3745-17-11(C)	See b)(2)c.
d.	OAC rule 3745-17-07(B)	Visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.
e.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	The emissions limitation established by this rule is equivalent to the emissions limitation established pursuant to OAC 3745-31-05(D). See b)(2)d.
f.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006	See b)(2)e.

(2) Additional Terms and Conditions

a. The maximum annual coating usage for this emissions unit shall not exceed 40 gallons, based upon a rolling, 365-day summation of the coating usage figures.

b. The permittee is exempt from the requirements of Ohio Administrative Code (OAC) 3745-21-09(U) as the permittee shall not apply more than 10 gallons of coating materials to miscellaneous metal parts per day.

c. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA

approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

i. The permittee is exempt from the requirements of Ohio Administrative Code (OAC) 3745-17-11(C) as the permittee employs a hand-help cup spray gun (OAC 3745-17-11(A)(k)).

d. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by 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 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

e. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and VOC emissions from this air contaminant source since the calculated annual emission rate for PE and VOC is less than 10 tons/year, taking into account the federally enforceable rule limit of 0.11 tons PE per year and 0.12 tons VOC per year under OAC 3745-31-05(D).

c) Operational Restrictions

(1) The maximum daily coating usage for this emissions unit shall not exceed 10 gallons.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records of the following information:

a. the coating usage for each day; and

b. the rolling, 365-day summation of the coating usage.

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(3) The permittee may, upon receipt of written approval from Ohio EPA Central District Office, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

(4) The permittee shall collect and record the following information on a daily basis for the coating and cleanup materials applied in this emissions unit:

a. the number of gallons of each coating applied or all coatings applied during the day;

b. the maximum VOC content for each <u>or</u> the maximum VOC content of all the coatings applied, in pounds per gallon;

c. the total VOC emissions from all coatings applied, i.e., the summation of the products of “a” times “b” for each individual coating applied; <u>or</u> the product of the maximum VOC content of all the coatings applied times the total gallons of coating employed during the day**,** i.e., “a” times “b” for worst case coating;

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

e. the VOC content of each cleanup material, in pounds per gallon;

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

g. the total VOC emission rate from all cleanup materials, i.e., the summation of the products of “e” times “f” for all cleanup materials employed; and

h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, the sum of “c” and “g”.

These daily records shall be maintained for the purpose of determining annual VOC emissions for the emissions unit.

(5) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)[1] that are applied in the emissions unit:

a. the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;

b. the name/identification of each individual HAP contained in each material applied (and identified in "a" above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;

c. the number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;

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

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

f. for each individual HAP, the calculated, controlled emission rate from all the materials employed, in ton(s), i.e., the total uncontrolled individual HAP emission rate calculated in "d" above, multiplied by 1 minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance;

g. the calculated, controlled combined HAPs emission rate for all the materials employed, in ton(s), i.e., the uncontrolled total combined HAPs emission rate, calculated in "e" above, multiplied by 1 minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance;

h. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in "f" above, for the present month plus the previous 11 months of operation, in ton(s); and

i. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in "g" above, for the present month plus the previous 11 months of operation, in ton(s).

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

(6) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be

less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified federally enforceable permit-to-install and operate (FEPTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(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:

The permittee shall not use more than 10 gallons of coating material per day or more than 40 gallons of coating material per rolling 365-day summation.

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

(4) The permittee shall notify Ohio EPA Central District Office in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 10 gallons per day. The notification shall include a copy of such record and shall be sent to Ohio EPA Central District Office within 30 days after the exceedance occurs.

f) Testing Requirements

(1) Compliance with the emission limitations in Section b) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emissions Limitation:
60.21 lbs/day and 0.12 ton/yr of VOC emissions from coatings

Applicable Compliance Method:
The daily emissions limitation was developed by multiplying the throughput of the coating (gal/hr) and the VOC weight percent (less exempt) of the coating by the coating density provided by the manufacturer. The resulting emission rate was then normalized with the thinner density used in 1 gallon of coating and multiplied by 10 gal/day.

The annual emissions limitation was developed by using the coating density of 1 gallon of coating, normalized with thinner, and multiplying by 40 gal/yr and a conversion factor of 1 ton/2000 lbs.

b. Emission Limitation:
39.65 lb/day and 0.11 ton/yr of Hazardous Air Pollutants (HAPs) from coatings

Applicable Compliance Method:

The daily emissions limitation was developed by multiplying the throughput of the coating (gal/hr) and the HAP weight percent of the coating by the coating density provided by the manufacturer. The resulting emission rate was then normalized with the thinner density used in 1 gallon of coating and multiplied by 10 gal/day.

The annual emissions limitation was developed by using the coating density of 1 gallon of coating, normalized with thinner, and multiplying by 40 gal/yr and a conversion factor of 1 ton/2000 lbs.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting Ohio EPA Central District Office. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

c. Emission Limitation:
39.65 lb/day and 0.08 ton/yr of toluene from coatings

Applicable Compliance Method:
The daily emissions limitation was developed by multiplying the throughput of the coating (gal/hr) and the toluene weight percent of the coating by the coating density provided by the manufacturer. The resulting emission rate was then normalized with the thinner density used in 1 gallon of coating and multiplied by 10 gal/day.

The annual emissions limitation was developed by using the coating density of 1 gallon of coating, normalized with thinner, and multiplying by 40 gal/yr and a conversion factor of 1 ton/2000 lbs.

d. Emission Limitation:
16.72 lb/day and 0.03 ton/yr particulate emissions (PE) from coatings

Applicable Compliance Method:
The daily emissions limitation was developed by multiplying the weight percent of solids in the coating and the density of the coating by 10 gal/day of coatings.

The annual emissions limitation was developed by multiplying the weight percent of solids in the coating and the density of the coating by 40 gal/year of coatings and a conversion factor of 1 ton/2000 lbs.

e. Emission Limitation:
Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method
If required, compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

(1) None.