



Environmental  
Protection Agency

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

6/15/2010

JOE VERHOFF  
Verhoff Machine & Welding  
7300 Road 18  
Continental, OH 45831

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0369002004  
Permit Number: P0106068  
Permit Type: Initial Installation  
County: Putnam

Certified Mail

|     |                                    |
|-----|------------------------------------|
| No  | TOXIC REVIEW                       |
| No  | PSD                                |
| No  | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No  | CEMS                               |
| Yes | MACT                               |
| No  | NSPS                               |
| No  | NESHAPS                            |
| No  | NETTING                            |
| No  | MAJOR NON-ATTAINMENT               |
| No  | MODELING SUBMITTED                 |
| No  | SYNTHETIC MINOR TO AVOID TITLE V   |
| No  | 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](http://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 Ohio EPA DAPC, Northwest District Office at (419)352-8461 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](http://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: Ohio EPA-NWDO





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Verhoff Machine & Welding**

Facility ID: 0369002004  
Permit Number: P0106068  
Permit Type: Initial Installation  
Issued: 6/15/2010  
Effective: 6/15/2010  
Expiration: 6/15/2020





Division of Air Pollution Control
Permit-to-Install and Operate
for
Verhoff Machine & Welding

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## Authorization

Facility ID: 0369002004  
Application Number(s): A0039156  
Permit Number: P0106068  
Permit Description: Permitting of the facility roadway, two new spray coating booths and an abrasive blast unit.  
Permit Type: Initial Installation  
Permit Fee: \$1,400.00  
Issue Date: 6/15/2010  
Effective Date: 6/15/2010  
Expiration Date: 6/15/2020  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Verhoff Machine & Welding  
7300 Road 18  
Continental, OH 45831

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

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

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0106068  
Permit Description: Permitting of the facility roadway, two new spray coating booths and an abrasive blast unit.

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

|                                   |                |
|-----------------------------------|----------------|
| <b>Emissions Unit ID:</b>         | <b>F001</b>    |
| Company Equipment ID:             | F001           |
| Superseded Permit Number:         |                |
| General Permit Category and Type: | Not Applicable |
| <b>Emissions Unit ID:</b>         | <b>K001</b>    |
| Company Equipment ID:             | K001           |
| Superseded Permit Number:         |                |
| General Permit Category and Type: | Not Applicable |
| <b>Emissions Unit ID:</b>         | <b>K002</b>    |
| Company Equipment ID:             | K002           |
| Superseded Permit Number:         |                |
| General Permit Category and Type: | Not Applicable |
| <b>Emissions Unit ID:</b>         | <b>P001</b>    |
| Company Equipment ID:             | P001           |
| 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, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed

permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> 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

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<sup>1</sup> 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. F001, Parking lot and roadways

Operations, Property and/or Equipment Description:

Parking Lot

- 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. None.
  - (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. None.
- 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), as effective 11/30/01 | Fugitive particulate emissions (PE) shall not exceed 1.71 tons per year (tpy).<br><br>Fugitive particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns (PM10) shall not exceed 0.44 tpy.<br><br>no visible particulate emissions except for a period of time not to exceed three minutes during any 60-minute observation period<br><br>best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust [See b)(2)c. through b)(2)h.] |
| b. | OAC rule 3745-17-07(B)                           | See b)(2)i.  |
| c. | OAC rule 3745-17-08(B)                           | See b)(2)j.  |

- (2) Additional Terms and Conditions
- a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), effective 11/30/01 have been determined to be the following:
- i. 1.71 tpy of fugitive PE;
  - ii. 0.44 tpy of fugitive PM10;
  - iii. use of best available control measures [see b)(2)d.]; and
  - iv. no visible particulate emissions except for a period of time not to exceed three minutes during any 60-minute observation period.
- b. The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:
- unpaved roadways and parking area:
- 199,999 square foot driveway area
- c. The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways with water and chemical stabilization as needed to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for an unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for the day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- e. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking areas that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- f. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such

material has been deposited by trucking or earth moving equipment or erosion by water or other means.

- g. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- h. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05(A)(3)(a).
- i. This emissions unit is exempt from the visible particulate emission limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.
- j. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

unpaved roadways and parking areas

minimum inspection frequency

all unpaved roadways and parking areas

once during each day of operation

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

- (3) The permittee shall maintain records of the following information:

- a. The date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation.
- b. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measures.

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

The information required in d)(3)d. unpaved roadways and parking areas shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(3) above:
  - a. all days during which any visible fugitive particulate emissions were observed; and
  - b. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

f) Testing Requirements

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

- a. Emission Limitation:  
Fugitive PE shall not exceed 1.71 tpy.

Fugitive PM10 shall not exceed 0.44 tpy.

Applicable Compliance Method:

The PE emission limitation was determined by multiplying AP-42 emission factor for unpaved roadways of 1.8 lb PE /VMT [Section 13.2.2 (11/06)] and the maximum vehicle miles traveled (VMT) of 1904 miles per year, and dividing by 2000 lbs/ton.

The PM10 emission limitation was determined by multiplying AP-42 emission factor for unpaved roadways of 0.46 lb PM10 /VMT [Section 13.2.2 (11/06)] and the maximum vehicle miles traveled (VMT) of 1904 miles per year, and dividing by 2000 lbs/ton.

Therefore, provided compliance is shown with the requirements of this permit to apply best available control measures, it shall be rebuttable presumption that compliance with the ton per year PE and PM10 limitations has been attained.

b. Emission Limitation:

No visible PE from unpaved roadways and parking areas except for a period of time not to exceed 3 minutes during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

g) Miscellaneous Requirements

(1) None.



2. P001, Blast Unit

Operations, Property and/or Equipment Description:

Blasting 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. None.

(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. None.

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), as effective 11/30/01        | Particulate emissions less than or equal to 10 microns in size (PM <sub>10</sub> ) shall not exceed 0.02 pound per hour (lb/hr) and 0.09 ton per year (tpy).<br><br>Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, from the baghouse.<br><br>See b)(2)a. and b(2)b. |
| b. | OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 | See b)(2)c.   |
| c. | OAC rule 3745-17-07(A)                                  | See b)(2)d.   |
| d. | OAC rule 3745-17-11(B)                                  | See b)(2)e.   |

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the following:

- i. The use of a baghouse house with 99% control efficiency.
  - b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by US EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the US 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 US EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.
  - c. This rule applies once US EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3) do not apply to the PM10 emissions from this air contaminant source since the uncontrolled potential to emit (PTE) is less than ten tons per year.
  - d. This emissions unit is exempt from the visible emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
  - e. The uncontrolled mass rate of particulate emissions (UMRE) from this emissions unit is less than 10 pounds per hour (lbs/hr). Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Putnam County.
- c) Operational Restrictions
- (1) The maximum annual abrasive material usage in this emission unit shall not exceed 548 tons.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the stack 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 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 emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(1)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission 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.

- (2) The permittee shall collect and record the following information for the abrasive material usage in emissions unit P001:
  - a. the monthly abrasive material usage employed, in tons per month; and
  - b. the annual, year to date abrasive material usage employed [summation of d)(2)a. for each calendar month to date from January to December], in tons per year.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall identify in the annual permit evaluation report any exceedance of the annual production rate limitation.
- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

f) Testing Requirements

- (1) Compliance with the emission limitations specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation: PM<sub>10</sub> emissions shall not exceed 0.020 lb/hr and 0.9 tpy.

Applicable Compliance Method: The hourly emission limitation was established by multiplying the abrasive material throughput of 125 lbs/hr by the emission factor of 13 lbs PM10/1000 lbs of abrasive material (AP-42 Chapter 13.2.6, revised 9/97) and applying a 99% control efficiency. If required, compliance shall be demonstrated based on the results of emission testing conducted in accordance with Methods 201/201A of 40 CFR Part 52, Appendix M.

Compliance with the annual emission limitation shall be demonstrated based on the record keeping requirements in d)(2).

- a. Emission Limitation: Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, from the baghouse.

Applicable Compliance Method: If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

- (1) None.



3. K001, coating operation

Operations, Property and/or Equipment Description:

Primer Booth (electrostatic, airless spray operation)

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)(4).

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

(a) None.

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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Rows include OAC rules 3745-31-05(A)(3), 3745-21-09(U)(2)(e)(iii), 3745-17-11(C), and 40 CFR Part 63, Subpart HHHHHH [40 CFR 63.11169-11180].



Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row 1: Coating Operations at Area Sources

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by US EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the US 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 US EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule applies once US EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit (PTE) is less than ten tons per year.

Potential emissions were determined by the summation of the annual VOC emissions for coating and clean-up materials. VOC emissions were calculated by multiplying the coating with the highest VOC content of 6.01 lbs per gallon of coating (as applied) by the maximum annual gallon usage of 390 and dividing by 2000 lbs/ton and for cleanup material, multiplying the solvent density of 7.1 lbs per gallon by the annual gallon usage of 55 and dividing by 2000 lbs/ton.

c. The permittee is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63, Subpart HHHHHH, promulgated January 9, 2008. The permittee shall comply with all applicable requirements for this emissions unit after the January 10, 2011, compliance date in 40 CFR Part 63, Subpart HHHHHH.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for coating material usage in this emissions unit:

a. the name and identification number of each coating employed;

- b. the volume, in gallons, of each coating employed; and
  - c. total volume, in gallons, of all coatings employed.
- (2) The permittee shall collect and record the following information each day for the coating and cleanup materials employed in this emissions unit:
- a. the name and identification of each coating employed;
  - b. the number of gallons of each coating employed;
  - c. the VOC content of each coating, as applied, in pounds per gallon;
  - d. the total VOC emission rate from all coatings employed [i.e., the summation of the products of d)(2)b. times d)(2)c. for each individual coating applied], in pounds;
  - e. the name and identification of each cleanup material employed;
  - f. the VOC content of each cleanup material, in pounds per gallon;
  - g. the number of gallons of each cleanup material employed;
  - h. the total number of gallons of all cleanup materials employed [i.e., summation of d)(2)g.];
  - i. the total VOC emission rate from all cleanup materials employed [i.e., the summation of the products of d)(2)f. times d)(2)g. for each individual cleanup material employed], in pounds; and
  - j. the total VOC emissions from all coatings and cleanup materials employed [i.e., the summation of d)(2)d. and d)(2)i.], in pounds.
- (3) The permittee shall calculate and record the total annual VOC emissions, in tons, from coatings and cleanup materials [i.e., the summation of the total daily VOC emissions from all of the coatings and cleanup materials employed from d)(2)j. for the calendar year].
- (4) 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 PTIO 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 PTIO.
- 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 coating line employs more

than the applicable maximum daily coating usage limit. 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) 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.

f) Testing Requirements

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

- a. Emission Limitation: VOC emissions shall not exceed 7.67 lb/day and 1.40 tpy, from the coating and cleanup operations.

Applicable Compliance Method: Compliance with the emission limitations shall be based upon the record keeping requirements specified in section d)(2) and d)(3).

- b. Emission Limitation: VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons of coating in any one day

Applicable Compliance Method: Compliance with the daily emission limitation shall be based upon the record keeping requirements specified in section d)(1).

g) Miscellaneous Requirements

- (1) None.



4. K002, Coating operation

Operations, Property and/or Equipment Description:

Top Coat Booth (electrostatic, airless spray operation)

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)(4).

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

(b) None.

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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Rows include OAC rules 3745-31-05(A)(3), 3745-21-09(U)(2)(e)(iii), 3745-17-11(C), and 40 CFR Part 63, Subpart HHHHHH.



Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row 1: Coating Operations at Area Sources

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by US EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the US 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 US EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule applies once US EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit (PTE) is less than ten tons per year.

Potential emissions were determined by the summation of the annual VOC emissions for coating and clean-up materials. VOC emissions were calculated by multiplying the coating with the highest VOC content of 2.11 lbs per gallon of coating (as applied) by the maximum annual gallon usage of 1215 and dividing by 2000 lbs/ton and for cleanup material, multiplying the solvent density of 7.1 lbs per gallon by the annual gallon usage of 240 and dividing by 2000 lbs/ton.

c. The permittee is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63, Subpart HHHHHH, promulgated January 9, 2008. The permittee shall comply with all applicable requirements for this emissions unit after the January 10, 2011, compliance date in 40 CFR Part 63, Subpart HHHHHH.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for coating material usage in this emissions unit:

a. the name and identification number of each coating employed;

- b. the volume, in gallons, of each coating employed; and
  - c. total volume, in gallons, of all coatings employed.
- (2) The permittee shall collect and record the following information each day for the coating and cleanup materials employed in this emissions unit:
- a. the name and identification of each coating employed;
  - b. the number of gallons of each coating employed;
  - c. the VOC content of each coating, as applied, in pounds per gallon;
  - d. the total VOC emission rate from all coatings employed [i.e., the summation of the products of d)(2)b. times d)(2)c. for each individual coating applied], in pounds;
  - e. the name and identification of each cleanup material employed;
  - f. the VOC content of each cleanup material, in pounds per gallon;
  - g. the number of gallons of each cleanup material employed;
  - h. the total number of gallons of all cleanup materials employed [i.e., summation of d)(2)g.];
  - i. the total VOC emission rate from all cleanup materials employed [i.e., the summation of the products of d)(2)f. times d)(2)g. for each individual cleanup material employed], in pounds; and
  - j. the total VOC emissions from all coatings and cleanup materials employed [i.e., the summation of d)(2)d. and d)(2)i.], in pounds.
- (3) The permittee shall calculate and record the total annual VOC emissions, in tons, from coatings and cleanup materials [i.e., the summation of the total daily VOC emissions from all of the coatings and cleanup materials employed from d)(2)j. for the calendar year].
- (4) 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 PTIO 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 PTIO.
- 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 coating line employs more

than the applicable maximum daily coating usage limit. 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) 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.

f) Testing Requirements

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

- a. Emission Limitation: VOC emissions shall not exceed 11.67 lbs/day and 2.13 tpy from the coating and cleanup operations.

Applicable Compliance Method: Compliance with the 12-month rolling emission limitation shall be based upon the record keeping requirements specified in section d)(2) and d)(3).

- b. Emission Limitation: VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons of coating in any one day

Applicable Compliance Method: Compliance with the daily emission limitation shall be based upon the record keeping requirements specified in section d)(1).

g) Miscellaneous Requirements

- (1) None.