



Environmental
Protection Agency

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

6/17/2010

Barry Keller
Wooster Tool and Supply Co.
P.O. Box 125
Bremen, OH 43107

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0285030456
Permit Number: P0105400
Permit Type: OAC Chapter 3745-31 Modification
County: Wayne

Certified Mail

Yes	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
Yes	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

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

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-NEDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Wooster Tool and Supply Co.**

Facility ID: 0285030456
Permit Number: P0105400
Permit Type: OAC Chapter 3745-31 Modification
Issued: 6/17/2010
Effective: 6/17/2010
Expiration: 3/16/2014



Division of Air Pollution Control
Permit-to-Install and Operate
for
Wooster Tool and Supply Co.

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Authorization

Facility ID: 0285030456
Application Number(s): A0038183
Permit Number: P0105400
Permit Description: FEPTIO modification of P0104257 for emissions units K001 and K003, and P0104351
for emissions unit K003.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$1,200.00
Issue Date: 6/17/2010
Effective Date: 6/17/2010
Expiration Date: 3/16/2014
Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

This document constitutes issuance to:

Wooster Tool and Supply Co.
899 Venture Blvd.
Wooster, OH 44691

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

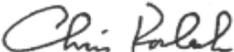
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

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: P0105400
Permit Description: FEPTIO modification of P0104257 for emissions units K001 and K003, and P0104351 for emissions unit K003.

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

Emissions Unit ID: K002
Company Equipment ID: Shop Floor Painting
Superseded Permit Number: P0104257
General Permit Category and Type: Not Applicable

Group Name: Compliance Coating Operations

Emissions Unit ID:	K001
Company Equipment ID:	Paint Booth 01
Superseded Permit Number:	P0104257
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Paint Booth 02
Superseded Permit Number:	P0104351
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, Northeast 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 submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated

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

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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

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Wooster Tool and Supply Co.

Permit Number: P0105400

Facility ID: 0285030456

Effective Date: 6/17/2010

- 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) 2.a), 2.b) and 2.c).

2. Applicable Emissions Limitations and/or Control Requirements:

- a) The specific operations(s), property, and/or equipment that constitute emissions units in this facility along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this facility 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
(1)	40 CFR Part 63, Subpart HHHHHH	See 2.b)(1) below.
(2)	40 CFR Part 63, Subpart XXXXXX	See 2.b)(2), 2.b)(3), 2.b)(4) and 2.c) below.

b) Additional Terms and Conditions

- (1) The facility is not subject to this rule in accordance with §63.11169(d)(6) of 40 Code of Federal Register (CFR), because it does not have paint stripping or autobody refinishing operations, and the surface coating activities in the facility are covered under 40 CFR Part 63, Subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories.
- (2) The facility is subject to this rule because it is primarily engaged in the operations in one of the nine source categories, Industrial Machinery, listed in §63.11514(a)(6) of 40 CFR.
- (3) The spray painting sources, K001 and K003, are exempted from the requirements of this rule, because the facility committed not to use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), as defined in §63.11522 of 40 CFR.
- (4) All dry abrasive blasting sources, machining sources, dry grinding and dry polishing with machines sources, and welding sources in this facility will become subject to the requirements under this rule if the source meets the applicability criterion of using materials that contain or have the potential to emit MFHAP, as defined in §63.11522 of 40 CFR.

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c) Prior to the use of any material in the facility, the permittee shall determine if the material contains or has the potential to emit any MFHAP, as defined in §63.11522 of 40 CFR, by collecting, recording, and retaining the following information for each material:

- (1) the name and company identification of the material;
- (2) the MSDS or other formulation information documenting the composition of the material;
and
- (3) statement of whether the material contains or has the potential to emit any MFHAPs.

The permittee shall apply for and obtain a PTI or FEPTIO (as applicable) to include the requirements of 40 CFR Part 63, Subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories prior to employing any material that contains or has the potential to emit any MFHAPs, as defined in §63.11522 of 40 CFR.

C. Emissions Unit Terms and Conditions

1. K002, Shop Floor Painting

Operations, Property and/or Equipment Description:

Miscellaneous metal parts spray operation and brush painting on shop floor

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

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

a. b)(1)g, d)(4), d)(5), d)(6), d)(7) and e)(2)

(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)d, b)(1)e, b)(1)f, b)(2)e, b)(2)f, d)(2)g, c)(2), d)(3)f, d)(3)h, d)(3)j, d)(3)l, e)(4), f)(1)d, f)(1)e, f)(1)f and f)(1)g

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 3745-17-11(C)	See b)(2)a below.
b.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)b below.
c.	ORC 3704.03(T)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-17-11(C). See b)(2)c and b)(2)d below.
d.	OAC rule 3745-31-05(D)(1)(b)	See b)(2)e and c)(2) below.
e.	40 CFR Part 63, Subpart HHHHHH	See b)(2)f below.
f.	40 CFR Part 63, Subpart XXXXXX	See b)(2)g below.
g.	ORC 3704.03(F)(4)	See d)(4), d)(5), d)(6), d)(7) and e)(2) below.

(2) Additional Terms and Conditions

a. In accordance with OAC rule 3745-17-11(A)(1)(h), this emissions unit is exempt from the requirements of OAC rule 3745-17-11(C), because it is a brush coating operation.

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- b. The permittee shall not employ more than 10 gallons of coating per day in this emissions unit.
 - c. Volatile organic compound (VOC) emissions from all coatings employed in this emissions unit shall not exceed 14.60 tons per rolling, 12-month period.
 - d. Facility-wide VOC emissions from all cleanup materials shall not exceed 11.80 tons per rolling, 12-month period.
 - e. The permittee proposed the following facility-wide restrictions to avoid Title V requirements, as well as MACT requirements under 40 CFR Part 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products:
 - i. facility-wide VOC emissions shall not exceed 96.40 tons per year, based upon a rolling, 12-month summation of total VOC emissions;
 - ii. facility-wide emissions of each individual hazardous air pollutant (HAP) shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of each individual HAP emissions;
 - iii. facility-wide emissions of total combined HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation of total combined HAPs emissions; and
 - iv. facility-wide coating usage shall not exceed 43,650 gallons per year, based upon a rolling, 12-month summation of total coating usage.
 - f. This emissions unit is not subject to this rule, because it is not a spray application of coatings, as defined in § 63.11180 of 40 CFR.
 - g. The facility is subject to this regulation because it is primarily engaged in the operations in one of the nine source categories, Industrial Machinery, listed in §63.11514(a)(6) of 40 CFR, but this emissions unit is exempt from the requirements, because it is not a spray painting source, as defined in §63.11522 of 40 CFR.
- c) Operational Restrictions
- (1) The facility-wide coating usage shall not exceed 43,650 gallons per year, based upon a rolling, 12-month summation. The permittee has existing coating usage records that demonstrate compliance with the facility-wide coating usage limitation for the first 12 calendar months of operation.
 - (2) To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the following facility-wide emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative VOC Emissions (tons)	Maximum Allowable Cumulative Emissions of Each Single HAP (tons)	Maximum Allowable Cumulative Emissions of Combined Total HAPs (tons)
1	10.0	1.0	2.5
1-2	20.0	2.0	5.0
1-3	30.0	3.0	7.5
1-4	40.0	4.0	10.0
1-5	50.0	5.0	12.5
1-6	60.0	6.0	15.0
1-7	70.0	7.0	17.5
1-8	80.0	8.0	20.0
1-9	90.0	9.0	22.5
1-10	96.40	9.90	24.90
1-11	96.40	9.90	24.90
1-12	96.40	9.90	24.90

After the first 12 calendar months of following the issuance of this permit, compliance with the emission limitations for VOC, each individual HAP, and total combined HAPs, shall be based upon a rolling, 12-month summation of the emissions of VOC, each individual HAP, and total combined HAPs.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a daily basis for the coating applied in this emissions unit:
 - a. the name or identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the total volume, in gallons, of all of the coatings employed;
 - d. the VOC content for each coating applied, in pounds per gallon; and
 - e. the total VOC emissions from all coatings, in pounds, i.e., the summation of the products of "b" times "d" for each individual coating employed.

- (2) The permittee shall collect and record the following information each month for this emissions unit:
- a. the name or identification number of each coating and cleanup material employed;
 - b. the volume, in gallons, of each coating and cleanup material employed;
 - c. the individual HAP content(s) for each coating and cleanup material employed, in pounds per gallon;
 - d. the total emissions of each individual HAP from all coatings and cleanup materials employed, i.e., the summation of the products of “b” times “c” for each coating and cleanup material employed;
 - e. the total combined HAPs content for each coating and cleanup material employed, in pounds per gallon;
 - f. the total emissions of total combined HAPs from all coatings and cleanup materials employed, i.e., the summation of the products of “b” times “e” for each coating and cleanup material employed;
 - g. the total VOC emissions from all coating employed, i.e., the summation of daily VOC emissions from all coatings, recorded in d)(1), for the month; and
 - h. the rolling, 12-month summation of total VOC emissions from all coatings employed in this emissions unit, in tons.
- (3) The permittee shall keep the following facility-wide information each month:
- a. the monthly usage of each cleanup material, in gallons per month;
 - b. the VOC content for each cleanup material employed, in pounds per gallon;
 - c. the VOC emissions from all cleanup materials employed, i.e., the summation of the products of “a” times “b” for each cleanup material employed;
 - d. the rolling, 12-month summation of total VOC emissions from all cleanup materials employed, in tons;
 - e. the monthly coating usage, in gallons per month;
 - f. the rolling, 12-month summation of total coating usage, in gallons;
 - g. the monthly facility-wide VOC emissions, in tons per month;
 - h. the rolling, 12-month summation of total VOC emissions facility-wide, in tons;
 - i. the monthly individual HAP emissions, in tons per month;
 - j. the rolling, 12-month summation of each individual HAP emissions, in tons;

- k. the monthly total combined HAPs emissions, in tons per month; and
 - l. the rolling, 12-month summation of total combined HAPs emissions, in tons.
- (4) The federally enforceable permit-to-install and operate (FEPTIO) application for these emissions units, K001, K002, and K003 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminants emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compounds emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):
$$\text{TLV}/10 \times 8/X \times 5/Y = 4 \text{ TLV}/XY = \text{MAGLC}$$
 - d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminants:

- i. Toxic Contaminant: Xylene
TLV (mg/m³): 434,192.23
Maximum Hourly Emission Rate (lbs/hr):
 - (a) 14.64 from emissions unit K001;
 - (b) 1.83 from emissions unit K002; and
 - (c) 14.64 from emissions unit K003Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,805
MAGLC (ug/m³): 10,337.91

- ii. Toxic Contaminant: Ethyl Benzene
TLV (mg/m³): 434,192.23
Maximum Hourly Emission Rate (lbs/hr):
 - (a) 4.40 from emissions unit K001;
 - (b) 0.55 from emissions unit K002; and
 - (c) 4.40 from emissions unit K003Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 542.44
MAGLC (ug/m³): 10,337.91

- iii. Toxic Contaminant: Toluene
TLV (mg/m³): 75,361.96
Maximum Hourly Emission Rate (lbs/hr):
 - (a) 6.08 from emissions unit K001;
 - (b) 0.76 from emissions unit K002; and
 - (c) 6.08 from emissions unit K003Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 749.55
MAGLC (ug/m³): 1,794.33

- iv. Toxic Contaminant: Trimethyl Benzene
TLV (mg/m³): 122,893.66
Maximum Hourly Emission Rate (lbs/hr):

- (a) 4.0 from emissions unit K001;
- (b) 0.5 from emissions unit K002; and
- (c) 4.0 from emissions unit K003

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 493.12

MAGLC (ug/m3): 2,926.04

The permittee, has demonstrated that emissions of xylene, ethyl benzene, toluene, and trimethyl benzene from these emissions units, K001, K002, and K003 are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (5) Prior to making any physical changes to or changes in the method of operation of these emissions units, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

- (6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

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- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit or the materials applied.
- (7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any daily record showing that this emissions unit employs more than 10 gallons maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.
 - (2) The permittee shall submit annual reports to the Ohio EPA Northeast District Office, documenting any changes made to a parameter or value used in the dispersion model (including the air toxic compounds emitted and the emission rate), that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. If no changes to the emissions unit or the exhaust stack have been made, then the report shall include a statement to this effect.
 - (3) The permittee shall also submit annual reports that specify the total facility VOC emissions, for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for the emissions units in the annual Fee Emission Report.
 - (4) 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

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potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. the facility-wide VOC emissions shall not exceed 96.4 tons per year, based upon a rolling, 12-month summation of total VOC emissions;
 - ii. the facility-wide emissions of any individual HAP shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of each individual HAP emissions;
 - iii. the facility-wide emissions of total combined HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summations of total combined HAPs emissions; and
 - iv. Facility-wide coating usage shall not exceed 43,650 gallons per year, based upon a rolling, 12-month summation of total coating usage.
- 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 (Ohio EPA Northeast District Office).

- (5) 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 PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) and b)(2) above shall be determined in accordance with the following methods:
 - a. Emission Limitation:

The permittee shall not employ more than 10 gallons of coating per day in this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(1)c.

b. Emission Limitation:

VOC emissions from all coatings employed in this emissions unit shall not exceed 14.60 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(2)h.

c. Emission Limitation:

Facility-wide VOC emissions from all cleanup materials shall not exceed 11.80 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3)d.

d. Emission Limitation:

Facility-wide VOC emissions shall not exceed 96.40 tons per year, based upon a rolling, 12-month summation of total VOC emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3)h.

e. Emission Limitation:

Facility-wide emissions of each individual HAP shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of each individual HAP emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3)j.

f. Emission Limitation:

Facility-wide emissions of total combined HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation of total combined HAPs emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3)l.

g. Emission Limitation:

Facility-wide coating usage shall not exceed 43,650 gallons per year, based upon a rolling, 12-month summation of total coating usage.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3)f.

- (2) USEPA Method 24 or formulation data shall be used to determine the VOC content of each coating.
- (3) Formulation data shall be used to determine each individual HAP content and total combined HAPs content of each coating.

g) Miscellaneous Requirements

- (1) None.

2. Emissions Unit Group - Compliance Coating Operations: K001, K003,

EU ID	Operations, Property and/or Equipment Description
K001	Miscellaneous metal parts spray booth 01. Parts air dried and manually moved.
K003	Miscellaneous metal parts spray booth 02. Parts air dried and manually moved.

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

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

a. b)(1)g, d)(4), d)(5), d)(6), d)(7) and e)(2)

(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)d, b)(1)e, b)(1)f, b)(2)e, c)(3), d)(3)f, d)(3)h, d)(3)j, d)(3)l, e)(4), f)(1)d, f)(1)e, f)(1)f and f)(1)g

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 3745-17-11(C)	b)(2)a, c)(1), d)(8), d)(9), d)(10), d)(11), d)(12) and d)(13).
b.	OAC rule 3745-21-09(U)(1)(d)	See b)(2)b below.
c.	ORC 3704.03(T)	The requirements established pursuant to this rule are also equivalent to the requirements of OAC rule 3745-17-11(C). See b)(2)c and b)(2)d below.
d.	OAC rule 3745-31-05(D)(1)(b)	See b)(2)e and c)(3) below.
e.	40 CFR Part 63, Subpart HHHHHH	See B.2.a)(1) above.
f.	40 CFR Part 63, Subpart XXXXXX	See B.2.a)(2) above.
g.	ORC 3704-03(F)(4)	See d)(4), d)(5), d)(6), d)(7) and e)(2) below.

(2) Additional Terms and Conditions

a. 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.

- b. Coatings applied in each emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average.
- c. The volatile organic compound (VOC) emissions from all coatings employed in each emissions unit shall not exceed 76.4 tons per rolling, 12-month period.
- d. Facility-wide VOC emissions from all cleanup materials shall not exceed 11.80 tons per rolling, 12-month period.
- e. The permittee proposed the following facility-wide restrictions to avoid Title V requirements, as well as MACT requirements under 40 CFR Part 63, Subpart MMM, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products:
 - i. facility-wide VOC emissions shall not exceed 96.40 tons per year, based upon a rolling, 12-month summation of total VOC emissions;
 - ii. facility-wide emissions of each individual hazardous air pollutant (HAP) shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of each individual HAP emissions;
 - iii. facility-wide emissions of total combined HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation of total combined HAPs emissions; and
 - iv. facility-wide coating usage shall not exceed 43,650 gallons per year, based upon a rolling, 12-month summation of total coating usage.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) The facility-wide coating usage shall not exceed 43,650 gallons per year, based upon a rolling, 12-month summation. The permittee has existing coating usage records that demonstrate compliance with the facility-wide coating usage limitation for the first 12 calendar months of operation.
- (3) To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the following facility-wide emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative VOC Emissions (tons)	Maximum Allowable Cumulative Emissions of Each Single HAP (tons)	Maximum Allowable Cumulative Emissions of Combined Total HAPs (tons)
1	10.0	1.0	2.5
1-2	20.0	2.0	5.0
1-3	30.0	3.0	7.5
1-4	40.0	4.0	10.0
1-5	50.0	5.0	12.5
1-6	60.0	6.0	15.0
1-7	70.0	7.0	17.5
1-8	80.0	8.0	20.0
1-9	90.0	9.0	22.5
1-10	96.40	9.90	24.90
1-11	96.40	9.90	24.90
1-12	96.40	9.90	24.90

After the first 12 calendar months of following the issuance of this permit, compliance with the emission limitations for VOC, each individual HAP, and total combined HAPs shall be based upon a rolling, 12-month summation of the emissions of VOC, each individual HAP, and total combined HAPs.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee, having chosen to demonstrate compliance by means of a daily volume-weighted average VOC content, shall collect and record the following information each day for each coating line:
 - a. the name and identification number of each coating, as applied;
 - b. the mass of VOC per volume of coating (excluding water and exempt solvents);
 - c. the number of gallons (excluding water and exempt solvents) of each coating, as applied;
 - d. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$, as follows:

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

where:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

e. the total number of gallons coatings employed; and

f. the VOC emissions from all coatings, i.e., the product of "c" times "d", in pounds.

(2) The permittee shall collect and record the following information each month for this emissions unit:

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

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

c. the individual HAP content(s) for each coating and cleanup material employed, in pounds per gallon;

d. the total emissions of each individual HAP from all coatings and cleanup materials employed, i.e., the summation of the products of "b" times "c" for each coating and cleanup material employed;

e. the total combined HAPs content for each coating and cleanup material employed, in pounds per gallon;

f. the total emissions of total combined HAPs from all coatings and cleanup materials employed, i.e., the summation of the products of "b" times "e" for each coating and cleanup material employed;

g. the total VOC emissions from all coatings employed, i.e., the summation of daily VOC emissions from all coatings, recorded in d)(1), for the month; and

h. the rolling, 12-month summation of total VOC emissions from all coatings employed in this emissions unit, in tons.

(3) The permittee shall keep the following facility-wide information each month:

a. the monthly usage of each cleanup material, in gallons per month;

b. the VOC content for each cleanup material employed, in pounds per gallon;

c. the VOC emissions from all cleanup materials employed, i.e., the summation of the products of "a" times "b" for each cleanup material employed;

d. the rolling, 12-month summation of total VOC emissions from all cleanup materials employed, in tons;

e. the monthly coating usage, in gallons per month;

f. the rolling, 12-month summation of total coating usage, in gallons;

- g. the monthly facility-wide VOC emissions, in tons per month;
 - h. the rolling, 12-month summation of total VOC emissions facility-wide, in tons;
 - i. the monthly individual HAP emissions, in tons per month;
 - j. the rolling, 12-month summation of each individual HAP emissions, in tons;
 - k. the monthly total combined HAPs emissions, in tons per month; and
 - l. the rolling, 12-month summation of total combined HAPs emissions, in tons.
- (4) The federally enforceable permit-to-install and operate (FEPTIO) application for these emissions units, K001, K002, and K003 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminants emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compounds emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

i. Toxic Contaminant: Xylene

TLV (mg/m³): 434,192.23

Maximum Hourly Emission Rate (lbs/hr):

(a) 14.64 from emissions unit K001;

(b) 1.83 from emissions unit K002; and

(c) 14.64 from emissions unit K003

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,805

MAGLC (ug/m³): 10,337.91

ii. Toxic Contaminant: Ethyl Benzene

TLV (mg/m³): 434,192.23

Maximum Hourly Emission Rate (lbs/hr):

(a) 4.40 from emissions unit K001;

(b) 0.55 from emissions unit K002; and

(c) 4.40 from emissions unit K003

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 542.44

MAGLC (ug/m³): 10,337.91

iii. Toxic Contaminant: Toluene

TLV (mg/m³): 75,361.96

Maximum Hourly Emission Rate (lbs/hr):

(a) 6.08 from emissions unit K001;

(b) 0.76 from emissions unit K002; and

(c) 6.08 from emissions unit K003

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 749.55

MAGLC (ug/m³): 1,794.33

iv. Toxic Contaminant: Trimethyl Benzene

TLV (mg/m³): 122,893.66

Maximum Hourly Emission Rate (lbs/hr):

- (a) 4.0 from emissions unit K001;
- (b) 0.5 from emissions unit K002; and
- (c) 4.0 from emissions unit K003

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 493.12

MAGLC (ug/m³): 2,926.04

The permittee, has demonstrated that emissions of xylene, ethyl benzene, toluene, and trimethyl benzene from these emissions units, K001, K002, and K003 are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (5) Prior to making any physical changes to or changes in the method of operation of these emissions units, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit or the materials applied.
- (7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- (8) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.
- (9) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.
- (10) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

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- (11) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (12) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

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

e) Reporting Requirements

- (1) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.
- (2) The permittee shall submit annual reports to the Ohio EPA Northeast District Office, documenting any changes made to a parameter or value used in the dispersion model (including the air toxic compounds emitted and the emission rate), that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. If no changes to the emissions unit or the exhaust stack have been made, then the report shall include a statement to this effect.
- (3) The permittee shall also submit annual reports that specify the total facility VOC emissions, for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for the emissions units in the annual Fee Emission Report.
- (4) 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:

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- i. the facility-wide VOC emissions shall not exceed 96.4 tons per year, based upon a rolling, 12-month summation of total VOC emissions;
 - ii. the facility-wide emissions of any individual HAP shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of each individual HAP emissions;
 - iii. the facility-wide emissions of total combined HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summations of total combined HAPs emissions; and
 - iv. facility-wide coating usage shall not exceed 43,650 gallons per year, based upon a rolling, 12-month summation of total coating usage.
- 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 Ohio EPA Northeast District Office).

- (5) 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 PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) and b)(2) above shall be determined in accordance with the following methods:

a. Emission Limitation:

Coatings applied in each emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(1)c.

b. Emission Limitation:

The VOC emissions from all coatings employed in each emissions unit shall not exceed 76.4 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(2)h.

c. Emission Limitation:

Facility-wide VOC emissions from all cleanup materials shall not exceed 11.80 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based up the record keeping requirements specified in section d)(3)d.

d. Emission Limitation:

Facility-wide VOC emissions shall not exceed 96.40 tons per year, based upon a rolling, 12-month summation of total VOC emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3)h.

e. Emission Limitation:

Facility-wide emissions of each individual HAP shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of each individual HAP emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3)j.

f. Emission Limitation:

Facility-wide emissions of total combined HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation of total combined HAPs emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3)l.

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g. Emission Limitation:

Facility-wide coating usage shall not exceed 43,650 gallons per year, based upon a rolling, 12-month summation of total coating usage.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3)f.

- (2) USEPA Method 24 or formulation data shall be used to determine the VOC content of each coating.
- (3) Formulation data shall be used to determine each individual HAP content and total combined HAPs content of each coating.

g) Miscellaneous Requirements

- (1) None.