



**Environmental
Protection Agency**

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

8/10/2010

Mark Hartman
Goodrich Corp
101 Waco St
Troy, OH 45373

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0855140039
Permit Number: P0106476
Permit Type: Administrative Modification
County: Miami

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
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 Regional Air Pollution Control Agency at (937)225-4435 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, Manager
Permit Issuance and Data Management Section, DAPC

Cc: RAPCA



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Goodrich Corp**

Facility ID: 0855140039
Permit Number: P0106476
Permit Type: Administrative Modification
Issued: 8/10/2010
Effective: 8/10/2010
Expiration: 10/26/2014



Division of Air Pollution Control
Permit-to-Install and Operate
for
Goodrich Corp

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Authorization

Facility ID: 0855140039
Application Number(s): A0039117
Permit Number: P0106476
Permit Description: Administrative modification permit for robot paint booths K001 and K002 to change from 8 gallons per day limitation to 3.5 pounds VOC per gallon as sprayed, and include voluntary annual coating usage restriction. Supercedes PTI 08-04293 and 08-04835.
Permit Type: Administrative Modification
Permit Fee: \$200.00
Issue Date: 8/10/2010
Effective Date: 8/10/2010
Expiration Date: 10/26/2014
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Goodrich Corp
101 Waco St
Troy, OH 30640

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:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

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: P0106476

Permit Description: Administrative modification permit for robot paint booths K001 and K002 to change from 8 gallons per day limitation to 3.5 pounds VOC per gallon as sprayed, and include voluntary annual coating usage restriction. Supersedes PTI 08-04293 and 08-04835.

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

Emissions Unit ID:

K001

Company Equipment ID: M2412
Superseded Permit Number: 08-04293
General Permit Category and Type: Not Applicable

Emissions Unit ID:

K002

Company Equipment ID: Spray Paint Booth
Superseded Permit Number: 08-04835
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 Regional Air Pollution Control Agency 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.

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).

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

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

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

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

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) The emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the facility from all permitted, de minimus, permit exempt, and permit by rule air contaminate air sources combined shall be less than 9.9 tons/yr for a single HAP and 24.9 tons/yr for any combination of HAPs, based on a rolling, 12-month summation.
 - (2) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)* that are applied in the facility:
 - a. the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;
 - b. the name/identification of each individual HAP contained in each material applied (and identified in a.) and the pound(s) of each HAP per gallon of each HAP-containing material applied;
 - c. the number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;
 - d. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of b. times c. for all the materials applied during the month, divided by 2,000 pounds;
 - e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from d.;
 - f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in f., for the present month plus the previous 11 months of operation, in ton(s); and
 - g. The total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in g., for the present month plus the previous 11 months of operation, in ton(s).

*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact.

Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following information:
- a. all exceedances of the rolling, 12-month individual HAP emission limitation for the facility; and
 - b. all exceedances of the rolling, 12-month total combined HAPs emission limitation for the facility.
- (4) The permittee shall submit annual reports that specify the individual and/or combined HAP emissions from the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission data from this facility in the annual Fee Emission Report.
- (5) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:
- a. Emission Limitation:
9.9 tons for each individual HAP/rolling, 12-month period
Applicable Compliance Method:
Compliance with the annual allowable individual HAP emission limitation above shall be based upon the record keeping requirements specified in b)(2).
 - b. Emission Limitation:
24.9 tons for all HAPs combined/rolling, 12-month period
Applicable Compliance Method:
Compliance with the annual allowable combined HAPs emission limitation above shall be based upon the record keeping requirements specified in b)(2).
- (6) The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR part 63 Subpart HHHHHH, National Emissions Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories. Although Ohio EPA has determined that this area source MACT (also known as the GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.

C. Emissions Unit Terms and Conditions



1. K001, M2400 Spray Paint Booth

Operations, Property and/or Equipment Description:

Miscellaneous Metal Parts Spray Booth with Filtration System (installed prior to August 3, 2006)

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 operation(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 are identified below. 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 3 columns: Row ID, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. It lists three rows (a, b, c) detailing specific rules and their corresponding emission control measures.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	MACT permitting requirements	
d.	OAC rule 3745-17-11(C)	The particulate emissions (PE) from this emissions unit shall be controlled by a dry particulate filter system, or equivalent control devices. See c)(1) and c)(2).
e.	OAC rule 3745-17-07(A)(1)	The visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

(2) Additional Terms and Conditions

- a. The hourly VOC emissions limitation, taking into account the applicable 3.5 lbs per gallon, as applied, excluding water and exempt solvents, gallon/day coating limitation of OAC rule 3745-21-09(U)(1)(c), was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping or reporting requirements to ensure compliance with this short term emissions limitation.
- b. Based on the annual coating usage restriction of 2743 gallons/year and the applicable coating VOC content restriction, the potential to emit of VOC for this emissions unit, as defined in OAC rule 3745-31-01, is 5.65 tons/year from coatings and cleanup materials. The permittee shall submit a new application for and a new permit be issued if a new process material is to be used that would cause the emissions unit to exceed the potential to emit established in this permit.

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 permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.
- (3) The maximum as applied annual coating usage for this emissions unit shall not exceed 2743 gallons.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was 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.

- (2) The permittee shall collect and record the following information each day for the coating line:
- a. The name and identification number of each coating employed.
 - b. The VOC content (excluding water and exempt solvents) of each coating, as applied.
 - c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - d. The daily VOC emissions from all the coatings employed, in pounds, [i.e., the sum of d)(2)b. times d)(2)c. for each coating employed].
 - e. The daily volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.
 - f. The total number of hours this emissions unit was in operation.
 - g. The average hourly VOC emissions from all coatings employed, in pounds [i.e., the quotient of b)(2)d. divided by b)(2)f.].
- Note: If the VOC content of each of the coatings employed during a day is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.
- (3) The permittee shall collect and record the following information for each month for this emissions unit:
- a. The company identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content of each cleanup material employed, in pounds per gallon.
 - d. The total VOC emissions from all the cleanup materials employed, in pounds [i.e., the sum of d)(3)b. x d)(3)c. for each cleanup material employed].
 - e. The amount of cleanup material recovered, in pounds.
 - f. The total monthly VOC emissions from cleanup operations, in pounds [i.e., d)(3)d. – d)(3)e.].
- (4) The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the average hourly VOC emission rates from the coating materials for the calendar year in d)(2) plus the sum of the monthly emissions from cleanup materials for the calendar year in d)(3)].

- (5) The permittee shall collect and record the following information each month for this emissions unit:
- a. The name and identification number of each coating material employed.
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.
 - c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from d)(5)b.
 - d. The number of gallons of each coating material employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from d)(5)f.
 - h. The number of gallons of each cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of the products of d)(5)b times d)(5)d. for each coating material plus the sum of the products of d)(5)f. times d)(5)h. for each cleanup material).
 - j. The total combined HAP emissions from all coating materials and cleanup materials employed, in pounds or tons per month (the sum of the products of d)(5)c. times d)(5)d. for each coating material plus the sum of the products of d)(5)g. times d)(5)h. for each cleanup material).
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing a daily volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the exceedance occurs.
 - (3) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and

shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the event occurs.

- (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:
 - i. The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.
 - ii. The maximum as applied annual coating usage for this emissions unit shall not exceed 2743 gallons.
 - iii. The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation.
 - iv. The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

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

- (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 permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit and include any deviations (excursions) or exceedances of the emission limitations, operational restrictions and/or control device operating parameter limitations in his permit.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:
- a. Emissions Limitation:

The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

b. Emissions Limitation:

The VOC emissions shall not exceed 3.5 pounds per hour from coatings.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

c. Emissions Limitation:

The VOC emissions shall not exceed 5.65 tons per year from both coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall based upon the record keeping specified in d)(4)

- (2) (In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

g) **Miscellaneous Requirements**

- (1) The terms and conditions in this PTIO supersede those in PTI 08-04293 issued 6/11/2002 for this emissions unit.



2. K002, M2421 Spray Paint Booth

Operations, Property and/or Equipment Description:

Miscellaneous Metal Parts Spray Booth with Filtration System (installed after August 3, 2006)

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	<p>Volatile organic compound (VOC) emissions shall not exceed 3.5 pounds per hour from coatings, and 5.65 tons per year from both coatings and cleanup materials.</p> <p>See b)(2)a., b)(2)c. and b)(2)d.</p> <p>The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(1)(c).</p>
b.	OAC rule 3745-31-05(F), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-21-09(U)(1)(c)	The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents, for the miscellaneous metal parts and products coating line.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V permitting requirements and MACT permitting requirements	See B.1.b)(1) of Facility-Wide Terms and Conditions.
e.	OAC rule 3745-17-11(C)	The particulate emissions (PE) from this emissions unit shall be controlled by a dry particulate filter system, or equivalent control devices. See c)(1) and c)(2).
f.	OAC rule 3745-17-07(A)(1)	The visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. 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 PE, NOx, SO₂, and CO emissions from this air contaminant source since the uncontrolled potential to emit for PE, NOx, SO₂, and CO is each less than 10 tons/year.

Permit to Install and Operate P0106476 for this air contaminant source takes into account the following for the purpose of avoiding Best Available Technology (BAT) requirements for VOC emissions under OAC rule 3745-31-05(A)(3):

- i. The federally enforceable 3.5 lbs-VOC per gallon, as applied, excluding water and exempt solvents, gallon/day coating limitation of OAC rule 3745-21-09(U)(1)(c).
- ii. The voluntary as applied annual coating usage restriction of 2743 gallons.

- iii. The voluntary VOC emissions limitation of 5.65 tons per year from both coatings and cleanup materials.
 - c. The hourly VOC emissions limitation, taking into account the applicable 3.5 lbs per gallon, as applied, excluding water and exempt solvents, gallon/day coating limitation of OAC rule 3745-21-09(U)(1)(c), was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping or reporting requirements to ensure compliance with this short term emissions limitation.
 - d. Based on the annual coating usage restriction of 2743 gallons/year, the potential to emit of OC for this emissions unit, as defined in OAC rule 3745-31-01, is 5.65 tons/year from coatings and cleanup materials. The permittee shall submit a new application for and a new permit be issued if a new process material is to be used that would cause the emissions unit to exceed the potential to emit established in this permit.
- 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 permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.
 - (3) The maximum as applied annual coating usage for this emissions unit shall not exceed 2743 gallons.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was 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.
 - (2) The permittee shall collect and record the following information each day for the coating line:
 - a. The name and identification number of each coating employed.
 - b. The VOC content (excluding water and exempt solvents) of each coating, as applied.
 - c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.

- d. The daily VOC emissions from all the coatings employed, in pounds, [i.e., the sum of d)(2)b. times d)(2)c. for each coating employed].
- e. The daily volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.
- f. The total number of hours this emissions unit was in operation.
- g. The average hourly VOC emissions from all coatings employed, in pounds [i.e., the quotient of b)(2)d. divided by b)(2)f.].

Note: If the VOC content of each of the coatings employed during a day is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

- (3) The permittee shall collect and record the following information for each month for this emissions unit:
 - a. The company identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content of each cleanup material employed, in pounds per gallon.
 - d. The total VOC emissions from all the cleanup materials employed, in pounds [i.e., the sum of d)(3)b. x d)(3)c. for each cleanup material employed].
 - e. The amount of cleanup material recovered, in pounds.
 - f. The total monthly VOC emissions from cleanup operations, in pounds [i.e., d)(3)d. – d)(3)e.].
- (4) The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the average hourly VOC emission rates from the coating materials for the calendar year in d)(2) plus the sum of the monthly emissions from cleanup materials for the calendar year in d)(3)].
- (5) The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating material employed.
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.
 - c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from d)(5)b).
 - d. The number of gallons of each coating material employed.

- e. The name and identification of each cleanup material employed.
- f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
- g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from d)(5)f).
- h. The number of gallons of each cleanup material employed.
- i. The total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of the products of d)(5)b times d)(5)d. for each coating material plus the sum of the products of d)(5)f. times d)(5)h. for each cleanup material).
- j. The total combined HAP emissions from all coating materials and cleanup materials employed, in pounds or tons per month (the sum of the products of d)(5)c. times d)(5)d. for each coating material plus the sum of the products of d)(5)g. times d)(5)h. for each cleanup material).

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing a daily volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the exceedance occurs.
- (3) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the event occurs.
- (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:
 - i. The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

- ii. The maximum as applied annual coating usage for this emissions unit shall not exceed 2743 gallons.
- iii. The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation.
- iv. The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

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

- (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 permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit and include any deviations (excursions) or exceedances of the emission limitations, operational restrictions and/or control device operating parameter limitations in his permit.

f) Testing Requirements

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

- a. Emissions Limitation:

The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

- b. Emissions Limitation:

The VOC emissions shall not exceed 3.5 pounds per hour from coatings.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

c. Emissions Limitation:

The VOC emissions shall not exceed 5.65 tons per year from both coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall based upon the record keeping specified in d)(4)

- (2) (In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

g) Miscellaneous Requirements

- (1) The terms and conditions in this PTIO supersede those in PTI 08-04835 issued 6/12/2007 for this emissions unit.