Ohio Environmental Protection Agency

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

Certified Mail

10/4/2010

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

SCOTT MOUTON
RUSSELL T. BUNDY ASSOCIATES INC
417 E WATER ST
PO BOX 150
URBANA, OH 43078

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0511010105
Permit Number: P0106574
Permit Type: OAC Chapter 3745-31 Modification
County: Champaign

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, Southwest District Office at (937)285-6357 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-SWDO

Response to Comments

Response to comments for: Permit-To-Install and Operate

Facility ID:	0511010105
Facility Name:	RUSSELL T. BUNDY ASSOCIATES INC
Facility Description:	811310 Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance
Facility Address:	417 E. WATER ST Urbana, OH 43078 Champaign County
Permit #:	P0106574, OAC Chapter 3745-31 Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Urbana Daily Citizen on 09/01/2010. The comment period ended on 10/01/2010.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: **None**
   a. Comment: **None**
   b. Response: **None**
2. Topic: **None**
   a. Comment: **None**
   b. Response: **None**

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
RUSSELL T. BUNDY ASSOCIATES INC

Facility ID:	0511010105
Permit Number:	P0106574
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	10/4/2010
Effective:	10/4/2010
Expiration:	4/1/2014

Ohio Environmental Protection Agency

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
RUSSELL T. BUNDY ASSOCIATES INC

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Authorization

Facility ID: 0511010105
Application Number(s): A0039798
Permit Number: P0106574
Permit Description: The change to compliance coatings and the removal of the incinerator. This will allow the company to cut cost and minimize the release of the release of air pollution.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $200.00
Issue Date: 10/4/2010
Effective Date: 10/4/2010
Expiration Date: 4/1/2014
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

RUSSELL T. BUNDY ASSOCIATES INC
417 E. WATER ST
Urbana, OH 43078

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, Southwest District Office
401 East Fifth Street
Dayton, OH 45402
(937)285-6357

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: P0106574
Permit Description: The change to compliance coatings and the removal of the incinerator. This will allow the company to cut cost and minimize the release of the release of air pollution.

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:	Conveyorized Coating System
Superseded Permit Number:	P0088715
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, Southwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed

permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.
If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.
You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.
You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.
Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

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

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

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

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

under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. K002, Conveyorized Coating System

Operations, Property and/or Equipment Description:

Application of silicone release coating, w/ compliance coatings, and curing of pans in ovens

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)h., d)(10) thru (13), and e)(2), below.

(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.	ORC 3704.03(T)	Use of compliance coatings for metal parts and products as defined in OAC rule 3745-21-09(U)(1)(c).
b.	OAC paragraph 3745-31-05(A)(3), as effective 11/30/01	The hourly particulate emissions (PE) from overspray shall not exceed 0.09 pounds. The hourly VOC emissions from the coating materials employed in this emissions unit shall not exceed 9.6 pounds. The monthly VOC emissions from the use of liquid organic cleanup materials employed in this emissions unit shall not exceed 716.1 pounds. Emissions from the combustion of natural gas in this emissions unit shall not

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed: 0.003 pounds per hour, nor 0.01 tons per year of PE/PM10; 0.001 pounds per hour, nor 0.004 tons per year of SO2; 0.15 pounds per hour, nor 0.66 tons per year of NOx; 0.13 pounds per hour, nor 0.57 tons per year of CO; and 0.0083 pounds per hour, nor 0.04 tons of VOC. See sections b)(2)a., and c., c)(3), d)(2), and (4), e)(1) and (3), f)(1)b. and e., below.
c.	OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See section b)(2)d., below.
d.	OAC rule 3745-31-05(D) (to avoid becoming a Title V facility and requirements of 40 CFR Part 63 Subpart MMMM)	The combined Hazardous Air Pollutant (HAP's) emissions from this facility shall not exceed 8.5 tons per rolling 12 month period. See sections d)(3), e)(1), and f)(1)c., below.
d.	OAC rule 3745-21-09(U)(1)(c)	Use of compliance coatings. See sections c)(1), d)(1), e)(1), and f)(1)a., below.
e.	OAC rule 3745-17-07(A)	Visible emissions shall not exceed 20% opacity as a six-minute average. See section f)(1)f., below.
f.	OAC rule 3745-17-10(B)	0.02 lb of PE per mm Btu from the tunnel oven See section f)(1)d., below.
g.	OAC rule 3745-17-11(C)	The use of a overspray control system. See sections b)(2)b., c)(2), d)(5) thru (9), and e)(1), below.
h.	OAC rule 3745-114-01	Ohio Air Toxics Rule See sections d)(10) thru (13), and e)(2), below.

(2) Additional Terms and Conditions

a. The hourly emission limitations for coating usage, overspray, and natural gas combustion limitations that were established for FEPTIO purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.

b. 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.

[OAC rule 3745-17-11(C)]

c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to the 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 3745-31-05, then these emission limits/control measures no longer apply.

d. This 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, (SIP).

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) emissions from this emissions unit since the potential emissions are less than ten tons per year.

c) Operational Restrictions

(1) Coatings employed in this operation shall not exceed 3.5 pounds VOC per gallon, excluding water and exempt solvents, as applied.

(2) The permittee shall install and operate a 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 according to the manufacturer's instructions and in house maintenance procedures**,** with any modifications deemed necessary by the permittee.

[OAC rule 3745-17-11(C)(1) and (2)(b)]

(3) The fuel employed in this emissions unit shall be only natural gas or propane.

d) Monitoring and/or Recordkeeping Requirements

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

a. The company identification of each coating material employed; and

b. The VOC content of each coating employed, in pounds per gallon, minus water and exempt solvents, as applied*.

*Including any "reconstituted solvents" and/or added thinners.

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

a. The company identification of each liquid organic cleanup material employed;

b. The VOC content of each liquid organic cleanup material employed, in pounds per gallon, as applied;

c. The amount of each liquid organic cleanup material employed, in gallon per month;

d. The VOC/OC emissions from the liquid organic cleanup material employed, in pounds per month, (the summation of: [∑("(2)b." x "(2)c.")]).

(3) The permittee shall collect and record the following information each month for the HAP(s) employed in all emissions units at this facility:

a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;

b. the name and identification number of each HAP containing material employed;

c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;

d. the amount of each HAP containing material employed, in gallons;

e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];

f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating]; and

g. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

*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, Southwest District Office contact. This information does not have to be kept on a line-by-line basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.

(4) For each day during which the permittee burns a fuel other than natural gas or propane in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(5) The permittee shall maintain according to the manufacturer's instructions and in house maintenance procedures for the overspray control system being employed, 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 appropriate Ohio EPA District Office or local air agency upon request.

(6) The permittee shall conduct periodic inspections of the overspray control system being employed to determine whether it is operating appropriately. These inspections shall be performed at a frequency that shall be based according to the manufacturer's instructions and in house maintenance procedures and the permittee shall maintain a copy of the manufacture's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(7) Not less than once each calendar year the permittee shall conduct a comprehensive inspection of the overspray control system being employed 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.

(8) The permittee shall document each inspection (periodic and annual) of the overspray control system being employed 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 appropriate Ohio EPA District Office or local air agency upon request.

(9) The permittee shall maintain records that document any time periods when the overspray control system being employed was not in service when the emissions unit was spray applying coatings, as well as, a record of all operations during which the overspray control system was not operated according to the manufacturer's instructions and in house maintenance procedures 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.

(10) The FEPTIO application for this emissions unit(s), K002, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) 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 contaminant(s) 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 result(s) 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 compound(s) emitted from the emissions unit(s), (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, 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 contaminant(s):

   Toxic Contaminant: Xylene.

   TLV (ppm): 100

   Maximum Hourly Emission Rate (lbs/hr): 2.03

Predicted 1-Hour Maximum Ground-Level Concentration (ppm): 0.091 ppm

MAGLC (ug/m3): 2.38 ppm

The permittee, has demonstrated that emissions of Xylene, from emissions unit K002, is 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).

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

(11) Prior to making any physical changes to or changes in the method of operation of the emissions unit, 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 FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

(12) 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(s) 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(s) or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

(13) 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

e) Reporting Requirements

(1) 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. when the overspray control system being employed was not in service when the emissions unit was spray applying coatings, as well as, all operations during which the overspray control system was not operated according to the according to the manufacturer's instructions and in house maintenance procedures with any documented modifications made by the permittee;

ii. when liquid coating materials employed in this operation exceeds 3.5 pounds VOC per gallon, excluding water and exempt solvents, as applied;

iii. when the monthly VOC emissions from the use of liquid organic cleanup materials employed in this emissions unit exceeds 716.1 pounds; and

iv. when the rolling 12 month combined HAP emissions from this facility exceeds 8.5 tons.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

(2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

(3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(4) 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.

(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.

[OAC rule 3745-15-03(B)(2)] and [OAC rule 3745-15-03(D)]

f) Testing Requirements

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

a. Emission Limitation:

VOC content of coatings employed shall not exceed 3.5 pounds VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based on the record keeping in section d) and reporting requirements in section e), of this permit.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of materials employed in this emissions unit.

b. Emission Limitation:

VOC emissions from the use of liquid organic cleanup material shall not exceed 716.1 pounds per month.

The above limitation is based on the following equation:

MER = Lc x VOC

Where:

MER = Monthly emissions rate, in pounds per month;

Lc = Liquid organic cleanup usage, in gallons per month, (110, from Emission Activity Category (EAC) form in FEPITO application); and

VOC = VOC content of liquid organic cleanup material employed, in pounds per gallon, as applied, (6.51, from Emission Activity Category (EAC) form in FEPITO application).

Applicable Compliance Method:

Compliance shall be based on the record keeping in section d) and reporting requirements in section e), of this permit.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of materials employed in this emissions unit.

c. Emission Limitation:

Combined HAP emissions from this facility shall not exceed 8.5 tons per rolling 12 month period.

Applicable Compliance Method:

Compliance shall be based on the record keeping in section d) and reporting requirements in section e), of this permit.

d. Emission Limitation:

0.020 pound per million Btu of actual heat input

Applicable Compliance Method:

Compliance is assumed based on the use of natural gas and/or propane as fuel in the record keeping in section d)(2) and reporting requirement in section e)(2) of this permit.

e. Emission Limitation:

Emissions from the combustion of natural gas in this emissions unit shall not exceed:

0.003 pounds per hour, nor 0.01 tons per year of PE/PM10;

0.001 pounds per hour, nor 0.004 tons per year of SO2;

0.15 pounds per hour, nor 0.66 tons per year of NOx;

0.13 pounds per hour, nor 0.57 tons per year of CO; and

0.0083 pounds per hour, nor 0.04 tons of VOC.

The above limitations are based on the following equations:

HER = [Btu / (1000 btu/cf)] x Ef

AER = (HER x 8760) / 2000

Where:

HER = Hourly emissions rate, in pounds emitted per hour;

AER = Annual Emission Rate, in tons emitted per year;

Btu = Combined BTU heat input of all three natural gas fired burners associated with this emissions unit, in mmBTU/hr, ((0.5 mmBTU/hr + 0.5 mmBTU/hr + 0.5 mmBTU/hr = 1.5 mm BTU/hr combined) from PTI application);

Ef = Emissions factors, in pounds emitted per mmcf, (1.9 PM/PM10, 0.6 SO2, 100 NOx, 84 CO, and 5.5 TOC(VOC), from PTI application calculation sheet and AP-42).

Applicable Compliance Method:

Compliance will be assumed based on the use of natural gas and the record keeping in section d) of this permit.

f. Emission Limitation:

Visible emissions shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9, as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002.

g) Miscellaneous Requirements

(1) None.