



Environmental
Protection Agency

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

10/5/2010

LARRY BOVILLE
BOVILLE INDUSTRIAL COATINGS INC
PO BOX 487
SMITHVILLE, OH 44677

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0285000381
Permit Number: P0106773
Permit Type: Renewal
County: Wayne

Certified Mail

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

Sincerely,

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

Cc: Ohio EPA-NEDO



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Boville Industrial Coatings is a job shop which coats both plastic and miscellaneous metal parts and products. The facility currently has two blast operations (emissions units P001 and P002), and seven coating booths (emissions units R001 - R007). This is a renewal permit for P001, P002, R001, R002, R004, R005, R006, and R007 with federally enforceable restrictions to avoid subject to the requirements of Title V and MACT.

3. Facility Emissions and Attainment Status:

The facility is located at Smithville, Wayne County, an area designated as "attainment" for all criteria pollutants, such as ozone, sulfur dioxide, PM_{2.5}, carbon monoxide and lead. Boville Industrial Coatings is not a "Major Source" for volatile organic compound (VOC) emissions and will not be a "Major Source" for any single hazardous air pollutant (HAP) and combined total HAPs, based upon the facility-wide restrictions of any single HAP emissions and combined total HAPs emissions. The requirements of Title V and MACT, subpart M, National Emission Standards for Surface Coating of Misc. Metal Parts and Products, are not subject to this facility.

4. Source Emissions:

This FEPTIO contains terms and conditions that restrict the facility-wide each single HAP emissions not to exceed 9.90 tons per year, and combined total HAPs not to exceed 24.90 tons per year. Boville Industrial Coatings is also required by this permit to track emissions of any single HAP and combined total HAPs, keep records, and submit reports.

5. Conclusion:

The emission limitations contained in this FEPTIO are adequate to provide federally enforceable limitations to ensure that the MACT, subpart M, and Title V thresholds will not be exceeded.

6. Please provide additional notes or comments as necessary:

During the permit processing, original air toxic analysis was re-evaluated based upon OAC rule 3745-114-01. The only air toxic remained in this permit is Toluene since the others are not listed in OAC rule 3745-114-01.



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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC _{each spray booth}	11.90
VOC _{facility-wide cleanup}	1.40
Any Single HAP _{facility-wide}	< 10.0
Combined Total HAP _{facility-wide}	< 25.0



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
BOVILLE INDUSTRIAL COATINGS INC**

Facility ID: 0285000381
Permit Number: P0106773
Permit Type: Renewal
Issued: 10/5/2010
Effective: 10/5/2010
Expiration: 10/5/2015



Division of Air Pollution Control
Permit-to-Install and Operate
for
BOVILLE INDUSTRIAL COATINGS INC

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Authorization

Facility ID: 0285000381

Application Number(s): A0040119, A0040216, A0040324

Permit Number: P0106773

Permit Description: Renewal federally enforceable permit for two blast operations and six spray booths for coating plastic and misc. metal parts and products.

Permit Type: Renewal

Permit Fee: \$0.00

Issue Date: 10/5/2010

Effective Date: 10/5/2010

Expiration Date: 10/5/2015

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

BOVILLE INDUSTRIAL COATINGS INC
7459 LEICHTY RD
SMITHVILLE, OH 44677

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Chris Korleski
Director



Authorization (continued)

Permit Number: P0106773
Permit Description: Renewal federally enforceable permit for two blast operations and six spray booths for coating plastic and misc. metal parts and products.

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

Group Name: Blast Operations

Emissions Unit ID:	P001
Company Equipment ID:	Blasting Room #1
Superseded Permit Number:	P0086375
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	Blasting Room #2
Superseded Permit Number:	P0086375
General Permit Category and Type:	Not Applicable

Group Name: Surface Coating Operations

Emissions Unit ID:	R001
Company Equipment ID:	Spray Paint Booth #1
Superseded Permit Number:	02-16207
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R002
Company Equipment ID:	Spray Paint Booth #2
Superseded Permit Number:	02-16207
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R004
Company Equipment ID:	Spray Paint Booth #4
Superseded Permit Number:	02-16207
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R005
Company Equipment ID:	Spray Paint Booth #5
Superseded Permit Number:	02-16207
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R006
Company Equipment ID:	Spray Paint Booth #6
Superseded Permit Number:	02-16207
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R007
Company Equipment ID:	Spray Paint Booth #7
Superseded Permit Number:	02-16207
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed

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

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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

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

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

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. Emissions Unit Group - Blast Operations: P001, P002,

EU ID	Operations, Property and/or Equipment Description
P001	Blast operation 1
P002	Blast operation 2

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.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 02-0746	Particulate emissions from each emissions unit shall not exceed 0.01 grain per dry standard cubic foot and 1.5 pounds per hour. There shall be no visible emissions from the exhaust of fabric filter serving the emissions unit.
b.	OAC rule 3745-17-11(B)	See b)(2)a and b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.

(2) Additional Terms and Conditions

a. The uncontrolled emission rate for each emissions unit is not ascertained, and therefore, in accordance with OAC rule 3745-17-11 (A)(2)(a), Figure II of OAC rule 3745-17-11 is not applicable to these emissions units.

- b. The facility is located in Wayne County. It is exempt from Table I of OAC rule 3745-17-11 requirements, per OAC rule 3745-17-11 (A)(2)(b).
 - c. In accordance with OAC rule 3745-17-07 (A)(3)(h), these emissions units are exempt from the visible particulate emission limitation.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emissions incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- e) Reporting Requirements
- (1) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in section d)(1) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to eliminate the visible particulate emissions.
 - (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitations specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
0.01 gr/dscf and 1.5 lbs of PE/hr

Applicable Compliance Method:

Compliance with the grain loading limit is assumed based on the manufacturer's rating of the baghouse. If necessary in the future, stack testing may be required to demonstrate compliance with this limit.

The hourly limit was created using the grain loading limit (0.01 gr/dscf) and the flow rate of the fabric filter system contributed to P001 (17,500 dcfm).

b. Emission Limitation:

There shall be no visible emissions from the exhaust of fabric filter serving this unit.

Applicable Compliance Method:

Compliance with the requirement for no visible particulate emissions from the exhaust of fabric filter shall be determined in accordance with U.S. EPA Method 22.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group - Surface Coating Operations: R001, R002, R004, R005, R006, R007,

EU ID	Operations, Property and/or Equipment Description
R001	Spray Booth No. 1
R002	Spray Booth No. 2
R004	Spray Booth No. 4
R005	Spray Booth No. 5
R006	Spray Booth No. 6
R007	Spray Booth No. 7

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

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

a. d)(6), d)(7), d)(8), d)(9), and e)(3).

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

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

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.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(C)	See c)(1), d)(10), d)(11), d)(12), d)(13), d)(14), d)(15), and e)(1).
b.	OAC rule 3745-21-07(G)(2)	Forty (40) pounds per day and eight (8) pounds per hour of organic compound (OC) emissions from this emissions unit for each day during which any photochemically reactive material is employed. See b)(2)a.
c.	OAC rule 3745-21-07(M)(2)	See b)(2)b.
d.	OAC rule 3745-21-09(U)(1)	See b)(2)c.
e.	OAC rule 3745-31-05(A)(3)	See b)(2)d.
f.	OAC rule 3745-31-05(D)(1)(b)	See b)(2)e.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	ORC 3704.03(F)(4)(c)	See d)(6), d)(7), d)(8), d)(9), and e)(3).

(2) Additional Terms and Conditions

- a. Each emissions unit becomes subject to OAC rule 3745-21-07(G)(2) on any day when any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), is employed.

The OC emission limitations of eight (8) pounds per hour and forty (40) pounds per day when photochemically reactive materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07 (G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting, and testing requirements related to these hourly and daily limitations shall be void.

- b. In accordance with OAC rule 3745-21-07(M)(3)(a), OAC rule 3745-21-07(M)(2) is not applicable because each emissions unit is not equipped with OC emissions control devices.

- c. Coatings applied in the coating operations shall not exceed the following, as a daily volume-weighted average:

- i. 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a clear coating;
- ii. 4.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a zinc rich primer coating;
- iii. 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating;
- iv. 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for any coating that is dried at temperatures not exceed two hundred degrees Fahrenheit;
- v. 6.2 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a high performance architectural aluminum coating; or
- vi. 3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, for any type of coating that is not described above.

- d. Volatile organic compound (VOC) emissions shall not exceed:

- i. 65.0 pounds per day from each emissions unit, when coating miscellaneous metal parts and products;
- ii. 11.90 tons per year from coating operations in each emissions unit; and

- iii. 1.40 tons per year from clean-up operations facility-wide.
- e. The permittee voluntarily proposed the following facility-wide restrictions to avoid Title V requirements, as well as MACT requirements under 40 CFR Part 63, Subpart Mmmm, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products:
 - i. Facility-wide emissions of each single hazardous air pollutant (HAP) shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of monthly emissions; and
 - ii. Facility-wide emissions of combined total HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.
- c) Operational Restrictions
 - (1) All exhaust from this emissions unit shall pass through the dry filters whenever it is in operation.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect and record the following information each day for each emissions unit when coating plastic parts, during which any photochemically reactive material is employed:
 - a. the name and identification number for each coating and cleanup material employed;
 - b. documentation on whether or not each material employed (coating and cleanup) was a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. the number of gallons of each coating and cleanup material employed minus the number of gallons of each coating and cleanup material recovered for disposal;
 - d. the OC content of each coating and cleanup material, in pounds OC per gallon;
 - e. the total OC emissions from all the coatings and cleanup materials, in pounds per day; i.e., the summation of the products of "c" times "d" for each coating and cleanup material;
 - f. the total number of hours each emissions unit was in operation; and
 - g. the average hourly OC emission rate for all the coatings and cleanup materials, i.e., "e" / "f", in pounds per hour.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, section d)(1) shall be voided entirely.]

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

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

where:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (3) The permittee shall collect and record the following information on a daily basis for the coating materials applied in each emissions unit:
- a. the number of gallons of coating applied during the day;
 - b. the maximum daily volume-weighted average VOC content calculated for $(C_{VOC,2})_A$ during the day;
 - c. the total VOC emissions from all coatings applied during the day, i.e., the product of the "a" times "b";

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

- (4) The permittee shall collect and record the following facility-wide information each month:
- a. the volume, in gallons, of each clean-up material employed;
 - b. the VOC content for each clean-up material employed;
 - c. the total VOC emissions from all clean-up materials employed, in pounds or tons, i.e., the summation of the products of "a" times "b" for each clean-up material;
 - d. the amount of VOC emissions from clean-up material recovered, in pounds or tons; and
 - e. the total monthly VOC emissions from clean-up operations, calculated as "c" minus "d", in pounds or tons.

- (5) The permittee shall also collect and record the following facility-wide information each month:
- a. the volume, in gallons, of each coating and clean-up material employed;
 - b. each single HAP contents for each coating and cleanup material applied, in pounds per gallon;
 - c. the monthly emissions of each single HAP from all coatings and cleanup materials applied, i.e., the summation of the products of “a” times “b” for each coating and clean-up material;
 - d. the combined total HAPs content for each coating and cleanup material applied, in pounds per gallon;
 - e. the monthly emissions of combined total HAPs from all coatings and cleanup materials applied, i.e., the summation of the products of “a” time “d” for each coating and clean-up material;
 - f. the rolling, 12-month summation of emissions of each single HAP, in tons; and
 - g. the rolling, 12-month summation of combined total HAPs emissions, in tons.
- (6) The permit application for emissions units R001, R002, R004, R005, R006, R007 was evaluated based on the actual materials and the design parameters of the emissions units’ exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit, (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 or “worst case” toxic contaminant(s):

Compound: Toluene

TLV (mg/m³): 75.362

Maximum Hourly Emission Rate (lbs/hr): 0.5

Predicted 1-Hour Maximum Ground Level Concentration (µg/m³): 16.1

MAGLC (µg/m³): 1,794.33

The permittee, has demonstrated that emissions of toluene from these emissions units are calculated to be less than eighty percent 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).

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

If the permittee determines that the "Toxic Air Contaminant Statute", ORC 3704.03(F), 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 units, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (8) 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.
- (9) 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.
- (10) The permittee shall maintain daily records for this emissions unit that document all time periods during which any dry filters were not in service when the emissions unit was in operation.
- (11) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.

- (12) The permittee shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.
- (13) The permittee shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
- (14) The permittee shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.
- (15) In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.

e) Reporting Requirements

- (1) The permittee shall notify the Director in writing of any daily record that showing the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.
- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
- (3) 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 quarterly deviation (excursion) reports. 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.

- (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 facility-wide emissions of each single HAP shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of monthly emissions; and
 - ii. the facility-wide emissions of combined total HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summations of monthly emissions.
 - 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 (postmarked) each year by the 31st of January (covering October to December), the 30th of April (covering January to March), the 31st of July (covering April to June), and the 31st of October (covering July to September), unless an alternative schedule has been established and approved by the director (the Ohio EPA Northeast District Office).

- (5) The permittee shall also submit annual reports that specify the total VOC emissions from each emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for each emissions unit in the annual Fee Emission Report.
 - (6) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitations in sections b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

Forty (40) pounds per day and eight (8) pounds per hour of OC emissions, when coating plastic parts, for each day during which any photochemically reactive material is employed

Applicable Compliance Method:

Compliance with the daily and hourly allowable OC emission limitations shall be determined based upon the record keeping requirements specified in d)(1).

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be voided entirely.]

b. Emission Limitation:

The appropriate limit from section b)(2)d above, in pounds VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average, for coatings used to coat metal parts and products.

Applicable Compliance Method:

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

c. Emission Limitation:

For each day when coating miscellaneous metal parts and products the VOC emissions shall not exceed 65.0 pound per day for this emissions unit.

Applicable Compliance Method:

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

d. Emission Limitation:

VOC emissions from this emissions unit shall not exceed 11.90 tons per year

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections d)(1) and d)(3) and shall be the summation of the calendar year.

e. Emission Limitation:

Facility-wide VOC emissions from clean-up operations shall not exceed 1.40 tons per year

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(4) and shall be the summation of the calendar year.

f. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(5)f.

g. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(5)g.

- (2) Any determination of VOC content, solids contents, or density of coating material or cleanup material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-04(B)(5), the permittee shall determine the composition of the coatings or cleanup material by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.

g) Miscellaneous Requirements

- (1) None.