



Environmental  
Protection Agency

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

10/13/2010

SCOTT WILSON  
Moyno, Inc.  
1895 WEST JEFFERSON ST.  
SPRINGFIELD, OH 45506

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

Facility ID: 0812100350  
Permit Number: P0105048  
Permit Type: Renewal  
County: Clark

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Springfield News Sun. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

and Regional Air Pollution Control Agency  
117 South Main Street  
Dayton, OH 45422-1280

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*  
RAPCA; Indiana





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Moyno Inc. is a manufacturer of pump and pumping equipment located in the city of Springfield, Clark County, Ohio. This Federally-Enforceable Permit to Install and Operate (FEPTIO) includes the following emissions units:

- K005 – Misc Metal Parts Paint Booth F50-66W
- K007 – Small Pump and Misc Metal Parts Paint Booth F61-RKL4800
- K008 – Stator Tube and Misc Metal Parts Adhesive Spray Booth F19-66R
- K009 – Stator Tube and Misc Metal Parts Adhesive Spray Booth F69-66R
- K010 – Misc Metal Parts Paint Booth F74-66Z
- R002 – Touch-up Misc Metal Parts Paint Booth F10-66A
- R005 – Castings, Stator Tube and Misc Metal Parts Paint Booth F14-66M

3. Facility Emissions and Attainment Status:

The location of the facility is currently designated as attainment for all criteria pollutants except PM2.5, which is classified as basic nonattainment. Prior to issuance of this FEPTIO, facility-wide potential emissions for combined hazardous air pollutant (HAP) were 43.2 tons per year and the potential individual HAP emissions were 21.5 tons per year. Facility-wide potential emissions for criteria pollutants are under 100 tons per year.

4. Source Emissions:

The potential emissions and limited emissions for these emissions units are shown in the following table:

Emissions Unit	Potential Emissions (tons/yr)		Limited Emissions (tons/yr)	
	Individual HAP	Combined HAP	Individual HAP	Combined HAP
K005	2.23	2.69	≤9.9	≤24.9
K007	2.23	2.69	≤9.9	≤24.9
K008	5.03	9.51	≤9.9	≤24.9
K009	5.03	9.51	≤9.9	≤24.9
K010	2.38	3.60	≤9.9	≤24.9
R002	2.23	2.69	≤9.9	≤24.9
R005	2.38	3.60	≤9.9	≤24.9
Facility-Wide Cleanup Usage	8.88	8.88	≤9.9	≤24.9
Total	21.5	43.2	≤9.9	≤24.9



5. Conclusion:

The facility has applied for this renewal FEPTIO to request federally enforceable terms and conditions in order to limit HAP emissions beneath major source thresholds. After obtaining this FEPTIO, facility-wide potential combined HAP emissions are 24.9 tons per year and the potential individual HAP emissions are 9.9 tons per year. HAP emissions have been limited through restrictions on the amount of HAP processed and through the inclusion of appropriate monitoring, record keeping and reporting requirements.

6. Please provide additional notes or comments as necessary:

None

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	51.9
Individual HAP	9.9
Combined HAP	24.9

PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install and Operate  
Moyno, Inc.

Issue Date: 10/13/2010  
Permit Number: P0105048  
Permit Type: Renewal  
Permit Description: Renewal FEPTIO for 7 miscellaneous metal parts paint booths  
Facility ID: 0812100350  
Facility Location: Moyno, Inc.  
1895 West Jefferson St.,  
Springfield, OH 45506  
Facility Description: Pump and Pumping Equipment Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Michael Maleski at Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280 or (937)225-4435. The permit can be downloaded from the Web page: [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc)





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Moyno, Inc.**

Facility ID: 0812100350  
Permit Number: P0105048  
Permit Type: Renewal  
Issued: 10/13/2010  
Effective: To be entered upon final issuance  
Expiration: To be entered upon final issuance





Division of Air Pollution Control
Permit-to-Install and Operate
for
Moyno, Inc.

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## Authorization

Facility ID: 0812100350

Application Number(s): A0037761

Permit Number: P0105048

Permit Description: Renewal FEPTIO for 7 miscellaneous metal parts paint booths

Permit Type: Renewal

Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 10/13/2010

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Moyno, Inc.  
1895 West Jefferson St.  
Springfield, OH 45506

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



# Authorization (continued)

Permit Number: P0105048  
Permit Description: Renewal FEPTIO for 7 miscellaneous metal parts paint booths

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

**Group Name: K005, K007-K010 Booths**

<b>Emissions Unit ID:</b>	<b>K005</b>
Company Equipment ID:	F50-66W
Superseded Permit Number:	P0091503
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K007</b>
Company Equipment ID:	F61-RKL4800
Superseded Permit Number:	P0091503
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K008</b>
Company Equipment ID:	F19-66R
Superseded Permit Number:	P0091503
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K009</b>
Company Equipment ID:	F69-66R
Superseded Permit Number:	P0091503
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K010</b>
Company Equipment ID:	F74-66Z
Superseded Permit Number:	P0091503
General Permit Category and Type:	Not Applicable

**Group Name: R002 and R005 Booths**

<b>Emissions Unit ID:</b>	<b>R002</b>
Company Equipment ID:	F10-66A
Superseded Permit Number:	P0091503
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R005</b>
Company Equipment ID:	F14-66M
Superseded Permit Number:	P0091503
General Permit Category and Type:	Not Applicable

**Draft Permit-to-Install and Operate**

Moyno, Inc.

**Permit Number:** P0105048

**Facility ID:** 0812100350

**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**

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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

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

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

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

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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Regional Air Pollution Control Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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 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.

**Draft Permit-to-Install and Operate**

Moyno, Inc.

**Permit Number:** P0105048

**Facility ID:** 0812100350

**Effective Date:** To be entered upon final issuance

## **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) B.2 through B.6.
2. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 tons per year (TPY) for any individual HAP and 24.9 TPY for the combination of all HAPs, based upon rolling, 12-month summations.
3. The permittee shall collect and record the following information each month for the entire facility:
  - a) The name and identification number of each coating material employed.
  - b) The individual hazardous air pollutant (HAP)\* content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.
  - c) The total combined HAPs content of each coating material, in pounds of combined HAPs per gallon, as applied [the sum of all the individual HAP contents from B.3.b)].
  - d) The number of gallons of each coating material employed.
  - e) The name and identification of each cleanup material employed.
  - f) The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
  - g) The total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [the sum of all the individual HAP contents from B.3.f)].
  - h) The number of gallons of each cleanup material employed.
  - i) The individual HAP content for each HAP of each recycled and waste cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
  - j) The total combined HAPs content of each recycled and waste cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [the sum of all the individual HAP contents from B.3.i)].
  - k) The number of gallons of each recycled and waste cleanup material employed.
  - l) The total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons per month [for each HAP, the sum of B.3.b) times B.3.d) for each

coating material plus the sum of B.3.f) times B.3.h) for each cleanup material, minus the sum of B.3.i) times B.3.k) for each recycled and waste cleanup material, divided by 2000 lb/ton].

- m) The total combined HAPs emissions from all coating materials and cleanup materials employed, in tons per month [the sum of B.3.c) times B.3.d) for each coating material plus the sum of B.3.g) times B.3.h) for each cleanup material, minus the sum of B.3.j) times B.3.k) for each recycled and waste cleanup material, divided by 2000 lb/ton].
- n) The rolling, 12-month summation of the total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons.
- o) The rolling, 12-month summation of the total combined HAPs emissions from all coating materials and cleanup materials employed, in tons.

\* A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line by line basis.

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:
  - (1) all exceedances of the rolling, 12-month emission limitation for each individual HAP; and
  - (2) all exceedances of the rolling, 12-month emission limitation for combined HAPs.
- 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).

5. The permittee shall also submit annual reports that specify the total individual HAP and combined HAP emissions from this 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 this emissions unit in the annual Fee Emission Report.

6. Compliance with the emission limitations in B.2 shall be determined in accordance with the following methods:

a) Emissions Limitation:

Individual HAP emissions from this facility shall not exceed 9.9 TPY, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in B.3 for each individual HAP with the addition of total chromium emissions from emissions unit P021.

b) Emissions Limitation:

Combined HAP emissions from this facility shall not exceed 24.9 TPY, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in B.3 for combined HAP with the addition of total chromium emissions from emissions unit P021.

7. The Ohio EPA has determined that this facility may be subject to the requirements of 40 CFR Part 63 Subpart XXXXXX, National Emissions Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories and/or 40 CFR Part 63 Subpart HHHHHH, National Emissions Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. Although Ohio EPA has determined that these area source MACT (also known as the GACT) standards may apply, at this time Ohio EPA does not have the authority to enforce these standards. Instead, U.S. EPA has the authority to enforce these standards. Please be advised, that all requirements associated with these rules are in effect and shall be enforced by U.S. EPA.

**Draft Permit-to-Install and Operate**

Moyno, Inc.

**Permit Number:** P0105048

**Facility ID:** 0812100350

**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**

**1. Emissions Unit Group - K005, K007-K010 Booths: K005, K007, K008, K009, K010,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K005	Misc Metal Parts Paint Booth F50-66W
K007	Small Pump and Misc Metal Parts Paint Booth F61-RKL4800
K008	Stator Tube and Misc Metal Parts Adhesive Spray Booth F19-66R
K009	Stator Tube and Misc Metal Parts Adhesive Spray Booth F69-66R
K010	Misc Metal Parts Paint Booth F74-66Z

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions from each emissions unit K005 and K007 shall not exceed 41.2 lb/day and 5.0 tons per year (TPY), both limits excluding cleanup.</p> <p>VOC emissions from emissions unit K010 shall not exceed 41.2 lb/day and 6.29 TPY, both limits excluding cleanup.</p> <p>VOC emissions from each emissions unit K008 and K009 shall not exceed 52.7 lb/day and 6.50 TPY, both limits excluding cleanup.</p> <p>See b)(2)a.</p>

**Draft Permit-to-Install and Operate**

Moyno, Inc.

**Permit Number:** P0105048

**Facility ID:** 0812100350

**Effective Date:** To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(i).
b.	OAC rule 3745-21-09(U)(2)(e)(i)	The permittee shall not employ more than eight gallons of coating per day for each emissions unit.
c.	OAC rule 3745-17-11(C)	See b)(2)b and c).

(2) Additional Terms and Conditions

- a. The combined VOC emissions from cleanup material for emissions units K005, K007, K008, K009, K010, R002 and R005 shall not exceed 8.88 TPY.
- 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.
- c. The daily VOC emissions limits, excluding cleanup, were established to reflect the potential to emit for these emissions units. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these short term emissions limitations.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for the coating line.
  - a. the name and identification number of each coating employed;

- b. the volume, in gallons, of each coating employed; and
  - c. the total volume, in gallons, of all of the coatings employed.
- (2) The permittee shall collect and record the following information on a monthly basis for the coating materials applied in this emissions unit:
- a. the number of gallons of each coating applied or all coatings applied during the month;
  - b. the VOC content for each or the maximum VOC content of all the coatings applied, in pounds per gallon; and
  - c. the total VOC emissions from all coatings applied, i.e., the summation of the products of d)(2)a times d)(2)b for each individual coating applied; or the product of the maximum VOC content of all the coatings applied times the total gallons of coating employed during the month, i.e., d)(2)a times d)(2)b for worst case coating.

These monthly records shall be maintained for the purpose of determining annual VOC emissions, excluding cleanup, for the emissions unit.

- (3) The permittee shall collect and record the following information on a monthly basis for the cleanup materials employed at emissions units K005, K007, K008, K009, K010, R002 and R005:
- a. the number of gallons of each cleanup material employed during the month;
  - b. the VOC content for cleanup material employed, in pounds per gallon;
  - c. the number of gallons of each cleanup material disposed of as waste or recycled during the month;
  - d. the VOC content of each cleanup material disposed of as waste or recycled, in pounds per gallon;
  - e. the total VOC emissions from all cleanup materials employed, i.e., the summation of the products of d)(3)a times d)(3)b for each individual cleanup material employed minus the products of d)(3)c times d)(3)d for each cleanup material disposed of as waste or recycled.

These monthly records shall be maintained for the purpose of determining annual VOC emissions from cleanup for emissions units K005, K007, K008, K009, K010, R002 and R005.

- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (6) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

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

- (8) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- e) Reporting Requirements
- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than eight gallons of coating per day. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
  - (2) The permittee shall also submit annual reports that specify the total VOC emissions from this 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 this emissions unit in the annual Fee Emission Report.

- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

- a. Emissions Limitation:

The permittee shall not employ more than eight gallons of coating per day for each emissions unit.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in d)(1).

- b. Emissions Limitation:

VOC emissions from each emissions unit K005, K007 and K010 shall not exceed 41.2 lb/day, excluding cleanup.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum coating usage per day (8 gal/day) by the maximum VOC content of the coatings (5.15 lb/gal).

- c. Emissions Limitation:

VOC emissions from each emissions unit K008 and K009 shall not exceed 52.7 lb/day, excluding cleanup.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum coating usage per day (8 gal/day) by the maximum VOC content of the coatings (6.59 lb/gal).

- d. Emissions Limitation:

VOC emissions from each emissions unit K005 and K007 shall not exceed 5.0 TPY, excluding cleanup.

VOC emissions from emissions units K010 shall not exceed 6.29 TPY, excluding cleanup.

VOC emissions from each emissions unit K008 and K009 shall not exceed 6.50 TPY, excluding cleanup.

Applicable Compliance Method:

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

e. Emissions Limitation:

The combined VOC emissions from cleanup material for emissions units K005, K007, K008, K009, K010, R002 and R005 shall not exceed 8.88 TPY.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in d)(3).

g) **Miscellaneous Requirements**

- (1) For emissions units K005 and K007, the requirements of this permit supersede the requirements of PTI 08-1800, issued March 10, 1993 and represent no increase in emissions.
- (2) For emissions units K008 and K009, the requirements of this permit supersede the requirements of PTI 08-2492 for these emissions units, issued September 2, 1992 and represent no increase in emissions for these emissions units.
- (3) For emissions unit K010, the requirements of this permit supersede the requirements of PTI 08-3746, issued November 19, 1997 and represent no increase in emissions.

2. Emissions Unit Group - R002 and R005 Booths: R002, R005,

EU ID	Operations, Property and/or Equipment Description
R002	Touch-up Misc Metal Parts Paint Booth F10-66A
R005	Castings, Stator Tube and Misc Metal Parts Paint Booth F14-66M

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(U)(2)(e)(i)	The permittee shall not employ more than eight gallons of coating per day for each emissions unit.
b.	OAC rule 3745-17-11(C)	See b)(2)b and c).

(2) Additional Terms and Conditions

a. The combined VOC emissions from cleanup material for emissions units K005, K007, K008, K009, K010, R002 and R005 shall not exceed 8.88 TPY.

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.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for the coating line.
  - a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed; and
  - c. the total volume, in gallons, of all of the coatings employed.
- (2) The permittee shall collect and record the following information on a monthly basis for the cleanup materials employed at emissions units K005, K007, K008, K009, K010, R002 and R005:
  - a. the number of gallons of each cleanup material employed during the month;
  - b. the VOC content for cleanup material employed, in pounds per gallon;
  - c. the number of gallons of each cleanup material disposed of as waste or recycled during the month;
  - d. the VOC content of each cleanup material disposed of as waste or recycled, in pounds per gallon;
  - e. the total VOC emissions from all cleanup materials employed, i.e., the summation of the products of d)(2)a times d)(2)b for each individual cleanup material employed minus the products of d)(2)c times d)(2)d for each cleanup material disposed of as waste or recycled.

These monthly records shall be maintained for the purpose of determining annual VOC emissions from cleanup for emissions units K005, K007, K008, K009, K010, R002 and R005.

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be

maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

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

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

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than eight gallons of coating per day. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
- (2) The permittee shall also submit annual reports that specify the total VOC emissions from this 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 this emissions unit in the annual Fee Emission Report.

- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

- a. Emissions Limitation:

The permittee shall not employ more than eight gallons of coating per day for each emissions unit.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in d)(1).

- b. Emissions Limitation:

The combined VOC emissions from cleanup material for emissions units K005, K007, K008, K009, K010, R002 and R005 shall not exceed 8.88 TPY.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

- (1) None.