Ohio Environmental Protection Agency

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

11/2/2010

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Monica Carsten
Steelcraft Mfg. Co.
9017 Blue Ash Road
Cincinnati, OH 45242-6816

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1431050879
Permit Number: P0106828
Permit Type: Administrative Modification
County: Hamilton

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it 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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Hamilton County Dept. of Environmental Services. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA
HCDOES; Indiana; Kentucky

50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

614 | 644 3020
614 | 644 3184 (fax)
www.epa.ohio.gov

Response to Comments

Response to comments for: Permit-To-Install

Facility ID:	1431050879
Facility Name:	Steelcraft Mfg. Co.
Facility Description:	Manufacturer of Steel Doors
Facility Address:	9017 Blue Ash Road Cincinnati, OH 45242-6816 Hamilton County
Permit #:	P0106828, Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Cincinnati Enquirer on 09/27/2010. The comment period ended on 10/27/2010.	
Hearing date (if held)	**NA**
Hearing Public Notice Date (if different from draft public notice)	NA

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

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

a. No comments received.

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Steelcraft Mfg. Co.

Facility ID: 1431050879
Permit Number: P0106828
Permit Type: Administrative Modification
Issued: 11/2/2010
Effective: 11/2/2010

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Steelcraft Mfg. Co.

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Authorization

Facility ID: 1431050879
Facility Description: Manufacturer of Steel Doors
Application Number(s): M0000947
Permit Number: P0106828
Permit Description: Agency-initiated Administrative Modification to permit PTI # 14-05897 for emissions unit K003 and K010 to establish BAT and conform with the July 2, 2010, memo "Permit Processing After U.S. District Court <10 Ton/Yr Exemption Decision"
Permit Type: Administrative Modification
Permit Fee: $0.00
Issue Date: 11/2/2010
Effective Date: 11/2/2010

This document constitutes issuance to:

Steelcraft Mfg. Co.
9017 Blue Ash Road
Cincinnati, OH 45242-6816

of a Permit-to-Install 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:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0106828
Permit Description: Agency-initiated Administrative Modification to permit PTI # 14-05897 for emissions unit K003 and K010 to establish BAT and conform with the July 2, 2010, memo "Permit Processing After U.S. District Court <10 Ton/Yr Exemption Decision"

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

Emissions Unit ID:	**K003**
Company Equipment ID:	Plant 3 spray booth
Superseded Permit Number:	14-05897
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K010**
Company Equipment ID:	Grain Tech Paint Line
Superseded Permit Number:	14-05897
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Hamilton County Dept. of Environmental Services.

(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Hamilton County Dept. of Environmental Services. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Hamilton County Dept. of Environmental Services every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Hamilton County Dept. of Environmental Services in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.
Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

d) The permittee shall submit progress reports to the Hamilton County Dept. of Environmental Services concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Hamilton County Dept. of Environmental Services.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Hamilton County Dept. of Environmental Services. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" 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).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be <u>obtained before</u> the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the “Owner/Contact Change” functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

C. Emissions Unit Terms and Conditions

1. K003, Plant 3 spray booth

Operations, Property and/or Equipment Description:

Miscellaneous Metal Parts Paint Booth

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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), as effective 11/30/01	Volatile organic compounds (VOC) emissions from the application of coatings, clear coatings, and cleanup materials shall not exceed 351.82 pounds per day (lb/day). Particulate emissions (PE) or particulate matter emissions 10 microns and less in diameter (PM10) or particulate matter emissions 2.5 microns and less in diameter (PM2.5) shall not exceed 0.551 pound per hour and 2.41 TPY. The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average. See b)(2)e. below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1), OAC rule 3745-31-05(D) and 40 CFR Part 63, Subpart MMMM.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)h. below.
c.	OAC rule 3745-31-05(D) to avoid non-attainment new source review	VOC emissions shall not exceed 13.61 tons per year (TPY) from the application of coatings and cleanup material used in this emissions unit, based on a rolling,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		12-month summation. See c)(1) through c)(3) below.
d.	OAC rule 3745-21-09(U)(1)(a)	See b)(2)b. below.
e.	OAC rule 3745-21-09(U)(1)(d)	See b)(2)c. below.
f.	40 CFR Part 63, Subpart MMMM	See 40 CFR Part 63.3890. Organic hazardous air pollutants (HAP) emissions shall not exceed 2.6 lbs per gallon (lb/gal) during each 12-month compliance period. See b)(2)f. below.
g.	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 pound per hour.
h.	OAC rule 3745-17-07(A)(1)	The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule average with regard to b)(1)b. For purposes of satisfying BAT, this limitation is equivalent to BAT as denoted in b)(1)a.

(2) Additional Terms and Conditions

a. The daily VOC emission limitation outlined above is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with these limitations.

[OAC rule 3745-31-05(A)(3)]

b. The VOC content for each clear coating employed in this emissions unit shall not exceed 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

[OAC rule 3745-21-09(U)(1)(a)]

c. The VOC content for each coating employed in this emissions unit that is dried at temperatures not exceeding two hundred degrees Fahrenheit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

[OAC rule 3745-21-09(U)(1)(d)]

d. The VOC content for each cleanup material employed in this emissions unit shall not exceed 7.3 pounds of VOC per gallon of cleanup material.

[OAC rule 3745-31-05(A)(3)]

e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations, OC content limitations and usage limitations.

f. Compliance with 40 CFR Part 63, Subpart MMMM shall be demonstrated by one of the compliance options listed in 40 CFR Part 63, Subpart MMMM, section 63.3891.

g. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, the rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then the mass PE, PM10, and PM2.5 emission limitations along with the visible particulate limitation in b)(1)a. no longer apply.

h. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan:

i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) or particulate matter emissions 10 microns and less in diameter (PM10) or particulate matter emissions 2.5 microns and less in diameter (PM2.5) from this air contaminate source because the calculated annual emissions rate for PE, PM10 and PM2.5 is less than 10 tons per year, taking into account the federally enforceable rule limit of 0.551 pound of PE per hour under OAC rule 3745-17-11(B).

c) Operational Restrictions

(1) The amount of coating used in this emissions unit shall not exceed 4500 gallons, excluding water and exempt solvents per year. Compliance with the above limitation shall be based on a rolling, 12 month-summation. The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

[OAC rule 3745-31-05(C)]

(2) The amount of clear coating used in this emissions unit shall not exceed 1880 gallons, excluding water and exempt solvents per year. Compliance with the above limitation shall be based on a rolling, 12 month-summation. The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

[OAC rule 3745-31-05(C)]

(3) The amount of cleanup material used in this emissions unit shall not exceed 450 gallons per year. Compliance with the above limitation shall be based on a rolling, 12 month-summation. The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

[OAC rule 3745-31-05(C)]

d) Monitoring and/or Recordkeeping Requirements

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

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

b. the VOC content of each cleanup material, as applied;

c. the VOC content of each coating material used, excluding water and exempt solvents, as applied.;

d. the number of gallons of each coating, excluding water and exempt solvents, as applied, and cleanup material employed;

e. the updated rolling twelve month total combined coatings, in gallons excluding water and exempt solvents, as applied and cleanup materials employed, in gallons; and

f. the updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in tons.

[OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-05(C)]

(2) See 40 CFR Part 63, Subpart MMMM (40 CFR 63.3881-3981).

e) Reporting Requirements

(1) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings or cleanup materials. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month in which the use of noncomplying coatings was recorded.

[OAC rule 3745-21-09(B)(3)]

(2) The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emission limitation set forth in b)(1) or the coating or cleanup usage limitation in c)(1), c)(2), and c)(3). The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

[Authority for Term: OAC rule 3745-31-05(C)]

(3) The permittee shall submit annual reports to the Hamilton County Department of Environmental Services quantifying the total VOC emissions from this emissions unit and the number of gallons of coating, excluding water and exempt solvents, as applied and cleanup materials used from this emissions unit. This report is due by January 31 of each year and shall cover the previous calendar year.

[Authority for Term: OAC rule 3745-31-05(C)]

(4) See 40 CFR Part 63, Subpart MMMM (40 CFR 63.3881-3981)

f) Testing Requirements

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

a. Emission Limitation:

VOC emissions from the application of coatings, clear coatings, and cleanup material shall not exceed 351.82 lb/day.

Applicable Compliance Method:

Compliance with the above VOC daily emission limitation shall be determined by multiplying the VOC content of the coating, clear coating, and cleanup material, excluding water and exempt solvents, as applied by the daily usage rate, excluding water and exempt solvents, as applied.

[Authority for Term: OAC rule 3745-31-05(A)(3)]

b. Emission Limitation:

VOC emissions shall not exceed 13.61 TPY from the application of coatings and cleanup material used in this emissions unit, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the above VOC annual emission limitation shall be determined by multiplying the VOC content of the coating, clear coating, and cleanup materials by each of their respective annual usage rates. This amount is then divided by 2,000 pounds to convert to tons of VOC per year. The tons of VOC per rolling, 12-month from the coating, clear coating, and cleanup material are then added together to give the total tons of VOC per year.

[Authority for Term: OAC rule 3745-31-05(C)]

c. Emission Limitation:

The VOC content for each clear coating employed in this emissions unit shall not exceed 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

The VOC content for each coating employed in this emissions unit that is dried at temperatures not exceeding two hundred degrees Fahrenheit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

The VOC content for each cleanup material employed in this emissions unit shall not exceed 7.3 pounds of VOC per gallon of cleanup material.

Applicable Compliance Method:

If required, USEPA methods 24 and 24A shall be used to determine the VOC content for coatings. If, pursuant 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for Term: OAC rule 3745-21-09(U)(1)(a), OAC rule 3745-21-09(U)(1)(d)]

d. Emission Limitation:

PE shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

The hourly PE rate limitation is based on Table 1 in OAC rule 3745-17-11.

To determine the worst case PE rate, the following equation shall be used:

E = maximum coating solids usage rate, in pounds per hour, x (1-TE) x (1-CE)

where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

[Authority for Term: OAC rule 3745-17-11(B)]

e. Emission Limitation:

Organic HAP emissions shall not exceed 2.6 lb/gal during each 12-month compliance period.

Applicable Compliance Method:

See 40 CFR Part 63, Subpart MMMM (40 CFR 63.3881-3981)

f. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

g. Emission Limitation:

Particulate emissions (PE) or particulate matter emissions 10 microns and less in diameter (PM10) or particulate matter emissions 2.5 microns and less in diameter (PM2.5) shall not exceed 2.41 TPY.

Applicable Compliance Method:

The annual PE, PM10 and PM2.5 emission rate is based on this emission unit's potential to emit. The annual PE, PM10 and PM2.5 emission rate is calculated by multiplying the maximum hourly emission rate by 8760 hours per year/2000 pounds per ton. The PM10 and PM2.5 emission rates are assumed to be less than or equal to the PE rate.

(2) Compliance with the requirements of terms and conditions c)(1), c)(2), and c)(3) shall be demonstrated by the record keeping required in term and condition d)(1).

[OAC rule 3745-31-05(C)]

g) Miscellaneous Requirements

(1) None.

2. K010, Grain Tech Paint Line

Operations, Property and/or Equipment Description:

Miscellaneous Metal Parts Paint Line

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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), as effective 11/30/01	Volatile organic compounds (VOC) emissions from the application of coatings, clear coatings, and cleanup materials shall not exceed 351.82 pounds per day (lb/day). Particulate emissions (PE) or particulate matter emissions 10 microns and less in diameter (PM10) or particulate matter emissions 2.5 microns and less in diameter (PM2.5) shall not exceed 0.551 pound per hour and 2.41 TPY. The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average See b)(2)e. below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1), OAC rule 3745-31-05(D) and 40 CFR Part 63, Subpart MMMM.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)h. below.
c.	OAC rule 3745-31-05(D) to avoid non-attainment new source review	VOC emissions shall not exceed 16.05 tons per year (TPY) from the application of coatings and cleanup material used in this emissions unit, based on a rolling,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		12-month summation. See c)(1) through c)(3) below.
d.	OAC rule 3745-21-09(U)(1)(a)	See b)(2)b. below.
e.	OAC rule 3745-21-09(U)(1)(d)	See b)(2)c. below.
f.	40 CFR Part 63, Subpart MMMM	See 40 CFR Part 63.3890. Organic hazardous air pollutants (HAP) emissions shall not exceed 2.6 lbs per gallon (lb/gal) during each 12-month compliance period. See b)(2)f. below.
g.	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 pound per hour average with regard to b)(1)b.
h.	OAC rule 3745-17-07(A)	The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average with regard to b)(1)b. For purposes of satisfying BAT, this limitation is equivalent to BAT as denoted in b)(1)a.

(2) Additional Terms and Conditions

a. The daily VOC emission limitation outlined above is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with these limitations.

[OAC rule 3745-31-05(A)(3)]

b. The VOC content for each clear coating employed in this emissions unit shall not exceed 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

[OAC rule 3745-21-09(U)(1)(a)]

c. The VOC content for each coating employed in this emissions unit that is dried at temperatures not exceeding two hundred degrees Fahrenheit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

[OAC rule 3745-21-09(U)(1)(d)]

d. The VOC content for each cleanup material employed in this emissions unit shall not exceed 7.3 pounds of VOC per gallon of cleanup material.

[Authority for Term: OAC rule 3745-31-05(A)(3)]

e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations, OC content limitations and usage limitations.

f. Compliance with 40 CFR Part 63, Subpart MMMM shall be demonstrated by one of the compliance options listed in 40 CFR Part 63, Subpart MMMM, section 63.3891.

g. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, the rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then the mass PE, PM10, and PM2.5 emission limitations along with the visible particulate limitation in b)(1)a. no longer apply.

h. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan:

i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) or particulate matter emissions 10 microns and less in diameter (PM10) or particulate matter emissions 2.5 microns and less in diameter (PM2.5) from this air contaminate source because the calculated annual emissions rate for PE, PM10 and PM2.5 is less than 10 tons per year, taking into account the federally enforceable rule limit of 0.551 pound of PE per hour under OAC rule 3745-17-11(B).

c) Operational Restrictions

(1) The amount of coating used in this emissions unit shall not exceed 5500 gallons, excluding water and exempt solvents per year. Compliance with the above limitation shall be based on a rolling, 12 month-summation. The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

[OAC rule 3745-31-05(C)]

(2) The amount of clear coating used in this emissions unit shall not exceed 2200 gallons, excluding water and exempt solvents per year. Compliance with the above limitation

shall be based on a rolling, 12 month-summation. The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

[OAC rule 3745-31-05(C)]

(3) The amount of cleanup material used in this emissions unit shall not exceed 450 gallons per year. Compliance with the above limitation shall be based on a rolling, 12 month-summation. The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

[OAC rule 3745-31-05(C)]

d) Monitoring and/or Recordkeeping Requirements

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

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

b. the VOC content of each cleanup material, as applied;

c. the VOC content of each coating material used, excluding water and exempt solvents, as applied.;

d. the number of gallons of each coating, excluding water and exempt solvents, as applied and cleanup material employed;

e. the updated rolling twelve month total combined coatings, in gallons excluding water and exempt solvents, as applied, and cleanup materials employed, in gallons; and

f. the updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in tons.

[OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-05(C)]

(2) See 40 CFR Part 63, Subpart MMMM (40 CFR 63.3881-3981).

e) Reporting Requirements

(1) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings or cleanup materials. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month in which the use of noncomplying coatings was recorded.

[OAC rule 3745-21-09(B)(3)]

(2) The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emission limitation set forth in term and condition b)(1) or the coating or cleanup usage limitation in terms and conditions c)(1), c)(2), and c)(3). The reports shall be submitted to the Director (the Hamilton County

Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

[Authority for Term: OAC rule 3745-31-05(C)]

(3) The permittee shall submit annual reports to the Hamilton County Department of Environmental Services quantifying the total VOC emissions from this emissions unit and the number of gallons of coating, excluding water and exempt solvents, as applied and cleanup materials used from this emissions unit. This report is due by January 31 of each year and shall cover the previous calendar year.

[Authority for Term: OAC rule 3745-31-05(C)]

(4) See 40 CFR Part 63, Subpart MMMM (40 CFR 63.3881-3981)

f) Testing Requirements

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

a. Emission Limitation:

VOC emissions from the application of coatings, clear coatings, and cleanup material shall not exceed 351.82 pounds per day (lb/day).

Applicable Compliance Method:

Compliance with the above VOC daily emission limitation shall be determined by multiplying the VOC content of the coating, clear coating, and cleanup material, excluding water and exempt solvents, as applied by the daily usage rate, excluding water and exempt solvents, as applied.

[Authority for Term: OAC rule 3745-31-05(A)(3)]

b. Emission Limitation:

VOC emissions shall not exceed 16.05 TPY from the application of coatings and cleanup material used in this emissions unit, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the above VOC annual emission limitation shall be determined by multiplying the VOC content of the coating, clear coating, and cleanup materials by each of their respective annual usage rates. This amount is then divided by 2,000 pounds to convert to tons of VOC per year. The tons of VOC

per rolling, 12-month from the coating, clear coating, and cleanup material are then added together to give the total tons of VOC per year.

[Authority for Term: OAC rule 3745-31-05(C)]

c. Emission Limitation:

The VOC content for each clear coating employed in this emissions unit shall not exceed 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

The VOC content for each coating employed in this emissions unit that is dried at temperatures not exceeding two hundred degrees Fahrenheit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

The VOC content for each cleanup material employed in this emissions unit shall not exceed 7.3 pounds of VOC per gallon of cleanup material.

Applicable Compliance Method:

If required, USEPA methods 24 and 24A shall be used to determine the VOC content for coatings. If, pursuant 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for Term: OAC rule 3745-21-09(U)(1)(a), OAC rule 3745-21-09(U)(1)(d)]

d. Emission Limitation:

PE shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

The hourly PE rate limitation is based on Table 1 in OAC rule 3745-17-11.

To determine the worst case PE rate, the following equation shall be used:

E = maximum coating solids usage rate, in pounds per hour, x (1-TE) x (1-CE)

where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

[Authority for Term: OAC rule 3745-17-11(B)]

e. Emission Limitation:

Organic hazardous air pollutants (HAP) emissions shall not exceed 2.6 lb per gallon (lb/gal) during each 12-month compliance period.

Applicable Compliance Method:

See 40 CFR Part 63, Subpart MMMM (40 CFR 63.3881-3981)

f. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

g. Emission Limitation:

Particulate emissions (PE) or particulate matter emissions 10 microns and less in diameter (PM10) or particulate matter emissions 2.5 microns and less in diameter (PM2.5) shall not exceed 2.41 TPY.

Applicable Compliance Method:

The annual PE, PM10 and PM2.5 emission rate is based on this emission unit's potential to emit. The annual PE, PM10 and PM2.5 emission rate is calculated by multiplying the maximum hourly emission rate by 8760 hours per year/2000 pounds per ton. The PM10 and PM2.5 emission rates are assumed to be less than or equal to the PE rate..

(2) Compliance with the requirements of c)(1), c)(2), and c)(3) shall be demonstrated by the record keeping required in d)(1).

[Authority for Term: OAC rule 3745-31-05(C)]

g) Miscellaneous Requirements

(1) None.