Ohio Environmental Protection Agency

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

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

11/8/2010

Thomas Von Bargen
Armor Metal Group
4600 N. Mason-Montgomery Road
Mason, OH 45040-9176

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1483090487
Permit Number: P0106850
Permit Type: Initial Installation
County: Warren

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, The Western Star. 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 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

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660

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 Hamilton County Dept. of Environmental Services at (513)946-7777.

Sincerely,

Michael W. Ahern

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

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

# Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   ___ Netting Determination

2. Source Description: Installation of one (1) two-gun miscellaneous metal parts coating operation (downdraft paint spray booth, K007) using compliance coatings with 3-stage particulate filters; Bay B Annex.

3. Facility Emissions and Attainment Status: Emissions from K007 consist of volatile organic compounds (VOC) and hazardous air pollutants (HAPs) from spray coating and equipment cleanup. Warren County has been designated attainment for the 8-hour ozone and non-attainment for particulate matter 2.5 microns and less in diameter (PM2.5).

4. Source Emissions: FEPTIO P0106850 will constitute the Initial FEPTIO for K007. The uncontrolled, unrestricted PTE VOC from this project is 417.53 TPY considering VOC from coatings at the SIP allowable VOC content (3.5 lbs VOC/gal) and the facility-supplied Maximum Operating Schedule. The facility has requested to restrict the VOC content of coatings used in K007 to between 1.0 lb/gal and 3.5 lbs/gal for several coating classes and the VOC content of cleanup material to 7.04 lbs VOC/gal. They have also requested to restrict the allowable annual coatings and cleanup material based on the coatings (between 50 gal/yr and 12,750 gal/yr). The result is a Synthetic Minor PTE VOC of 9.96 TPY for K007.

   This FEPTIO carries over a Federal restriction to limit HAPs emissions from the facility through the use of HAPs emissions limits and recordkeeping requirements. The facility-wide Federally Enforceable PTE HAPs after this FEPTIO (Synthetic Minor) will be 9.9 TPY/24.9 TPY allowing Armor Metal to avoid Title V requirements.

5. Conclusion: This FEPTIO includes Federal restrictions limiting the VOC and HAPs emissions on rolling, 12-month bases, including the appropriate recordkeeping and reporting to qualify as a Synthetic Minor to avoid NSR, MACT, & Title V requirements.

6. Please provide additional notes or comments as necessary:

   None

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

| Pollutant | Tons Per Year |
|---|---|
| VOC | 9.96 |

Warren County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Armor Metal Group

Issue Date: 11/8/2010
Permit Number: P0106850
Permit Type: Initial Installation
Permit Description: Installation of one (1) two-gun miscellaneous metal parts coating operation (downdraft paint spray booth) using compliance coatings with 3-stage particulate filters; Bay B Annex.
Facility ID: 1483090487
Facility Location: Armor Metal Group
4600 N. Mason-Montgomery Road,
Mason, OH 45040-9176
Facility Description: Railroad Rolling Stock 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 Alberta Mellon at Hamilton County Dept. of Environmental Services, 250 William Howard Taft Pkwy., Cincinnati, OH 45219-2660 or (513)946-7777. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Ohio | Environmental Protection Agency

# DRAFT

# Division of Air Pollution Control
# Permit-to-Install and Operate
for
Armor Metal Group

| | |
|---|---|
| Facility ID: | 1483090487 |
| Permit Number: | P0106850 |
| Permit Type: | Initial Installation |
| Issued: | 11/8/2010 |
| Effective: | To be entered upon final issuance |
| Expiration: | To be entered upon final issuance |

Ohio Environmental Protection Agency

**Division of Air Pollution Control**
**Permit-to-Install and Operate**
for
Armor Metal Group

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# Authorization

Facility ID: 1483090487
Application Number(s): A0040206
Permit Number: P0106850
Permit Description: Installation of one (1) two-gun miscellaneous metal parts coating operation (downdraft paint spray booth) using compliance coatings with 3-stage particulate filters; Bay B Annex.
Permit Type: Initial Installation
Permit Fee: $200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/8/2010
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:

Armor Metal Group
4600 N. Mason-Montgomery Road
Mason, OH 45040-9176

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:

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 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: P0106850
Permit Description: Installation of one (1) two-gun miscellaneous metal parts coating operation (downdraft paint spray booth) using compliance coatings with 3-stage particulate filters; Bay B Annex.

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

| | |
|---|---|
| **Emissions Unit ID:** | **K007** |
| Company Equipment ID: | Bay B Annex Paint Booths |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |

# A. Standard Terms and Conditions

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

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

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

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.
The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

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

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.
If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

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

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

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

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

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

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).
The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Hamilton County Dept. of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.
If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

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

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

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

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

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

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.

# 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) 2., 3., 4., & 5.

2. The allowable emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001 (Bay A – Compliant Coatings), K002 (Bay A – Noncompliant coatings), K003 (Bay B – Compliant Coatings), K004 (Bay B – Noncompliant coatings), K005 (High Bay – Compliant Coatings), K006 (High Bay – Noncompliant coatings), K007 (Bay B Annex Paint Booths), P001 (Plasma Cutter), and P002 (Diesel Generator) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be determined based upon a rolling, 12-month summation.

3. The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)[1] that are applied in the emissions unit:

   a) The name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;

   b) The name/identification of each individual HAP contained in each material applied (and identified in “a” above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;

   c) The number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;

   d) For each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of “b” times “c” for all the materials applied during the month, divided by 2,000 pounds;

   e) The total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from “d” above;

   f) For each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in “d” above, for the present month plus the previous 11 months of operation, in ton(s); and

   g) The total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in “e” above, for the present month plus the previous 11 months of operation, in ton(s).

[1]A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

4. The permittee shall submit quarterly deviation (excursion) reports for the following emissions unit(s) 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:

| Emissions unit IDs | Term & Condition |
|---|---|
| K001, K002, K003<br>K004, K005, K006,<br>K007, P001, and P002 | B.2. |

   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. Compliance with the emission limitations in 2. of these terms and conditions shall be determined in accordance with the following method(s) identified below:

   a) Emission Limitations:

      The allowable emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units, as specified in 2. above, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be determined based upon a rolling, 12-month summation.

      Applicable Compliance Method:

      Compliance with the HAP emission limitations shall be demonstrated by the methods outlined in the recordkeeping requirements in 3. above.

# C. Emissions Unit Terms and Conditions

## 1. K007, Bay B Annex Paint Booths

**Operations, Property and/or Equipment Description:**

Two-gun miscellaneous metal parts coating operation (downdraft paint spray booth) using compliance coatings with 3-stage particulate filters; Bay B Annex

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3), as effective 11/30/01 | Emissions of volatile organic compounds (VOC) shall not exceed 131.3 pounds per hour from miscellaneous metal parts coating.<br><br>See b)(2)a. and b)(2)b.<br><br>Compliance with OAC rule 3745-31-05(A)(3) also includes compliance with OAC rule 3745-31-05(D), OAC rule 3745-17-11(C) and OAC rule 3745-21-09(D). |
| b. | OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06 | See b)(2)c. |
| c. | OAC rule 3745-31-05(D) Synthetic Minor for HAPs and VOC to avoid New Source Review, Title V and MACT. | Emissions of VOC shall not exceed 9.96 TPY based on a rolling, 12-month summation, from miscellaneous metal parts coating and cleanup.<br><br>See Section B.2., b)(2)b. and b)(2)d. |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| d. | OAC rule 3745-17-11(C) | See b)(2)e., c)(1), and c)(2). |
| e. | OAC rule 3745-21-09(D) for coatings dried at temperatures not exceeding 200 degrees Fahrenheit | Coatings applied in the coating operations shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents. |

(2) Additional Terms and Conditions

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

b. Coatings and cleanup materials applied in this emissions unit shall not exceed the following VOC content limits, in pounds of VOC per gallon of coating, excluding water and exempt solvents:

| | | |
|---|---|---|
| i. | Hentzen CARC topcoat | 1.00 pound VOC per gallon |
| ii. | PPG Primer Gray | 3.50 pounds VOC per gallon |
| iii. | PPG White | 2.75 pounds VOC per gallon |
| iv. | PPG Black | 2.80 pounds VOC per gallon |
| v. | Hentzen Black | 3.50 pounds VOC per gallon |
| vi. | Cleanup solvent | 7.04 pounds VOC per gallon. |

c. 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.

Federally Enforceable Permit to Install and Operate (FEPTIO) P0106850 for this air contaminant sources takes into account the following voluntary restrictions (including the use of any air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. Limiting the coating and cleanup material usages to the annual limits outlined in b)(2)d.; and

ii. Limiting the annual VOC emissions to 9.96 TPY from miscellaneous metal parts coating and cleanup.

d. The maximum annual coating usage for this emissions unit shall not exceed the following limitations, based upon rolling, 12-month summations of the coating and cleanup material usage figures. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating and cleanup material usage levels, in gallons, specified in the following table for the designated coatings and cleanup material:

| Month(s) | No.1* | No.2* | No.3* | No.4* | No.5* | No.6* |
|---|---|---|---|---|---|---|
| 1 | 1063 | 50 | 21 | 21 | 4 | 41 |
| 1-2 | 2125 | 100 | 42 | 42 | 8 | 83 |
| 1-3 | 3188 | 150 | 63 | 63 | 13 | 124 |
| 1-4 | 4250 | 200 | 83 | 83 | 17 | 166 |
| 1-5 | 5313 | 250 | 104 | 104 | 21 | 207 |
| 1-6 | 6375 | 300 | 125 | 125 | 25 | 249 |
| 1-7 | 7438 | 350 | 146 | 146 | 29 | 290 |
| 1-8 | 8500 | 400 | 167 | 167 | 33 | 331 |
| 1-9 | 9563 | 450 | 188 | 188 | 38 | 373 |
| 1-10 | 10625 | 500 | 208 | 208 | 42 | 414 |
| 1-11 | 11688 | 550 | 229 | 229 | 46 | 456 |
| 1-12 | 12750 | 600 | 250 | 250 | 50 | 497 |

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating usage limitations shall be based upon rolling, 12-month summations of the coating and cleanup material usage figures.

*No. 1 coating is Hentzen CARC Topcoat; No. 2 coating is PPG Primer Gray; No. 3 Coating is PPG White; No. 4 coating is PPG Black; No. 5 coating is Hentzen Black; No. 6 is cleanup material

e. 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.

f. The hourly VOC emission limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emission limitation.

c) Operational Restrictions

(1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the 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, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating operations and shall maintain this information at the facility for a period of three years:

a. The name and identification number of each coating, as applied; and

b. The mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

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

where:

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

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

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

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

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

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

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

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

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

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

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific gallons/year and/or tons/year limitation in a PTIO, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

(2) The permittee shall maintain monthly records of the following information:

a. The coatings and cleanup material usage, in gallons, for each month, for each of the coatings and cleanup material listed in b)(2)d.;

b. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the coatings and cleanup material usage figures, in gallons, for each of the coatings and cleanup material listed in b)(2)d.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative coatings and cleanup material usage for each calendar month;

c. The total VOC emission rate, in tons, for each month of operations from the usage of all coatings and cleanup material, combined. The total VOC emissions rate shall be the summation of the products of the VOC contents, as recorded in d)(1)b., multiplied by the monthly coatings and cleanup usages, as recorded in d)(2)a., for all the individual coatings and cleanup materials applied during the month, multiplied by 1 Ton/2000 pounds equaling tons VOC per month, combined; and

d. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the total VOC emissions, in tons, from the usage of all coatings and cleanup material, combined. The total VOC emissions rate shall be the summation of the total VOC emissions as recorded in d)(2)c. for the present month plus the previous 11 months of operation.

(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(s) was/were 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.

(8) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

(1) 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.

(2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

(3) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. All exceedances of the coatings and cleanup material VOC content limits is b)(2)b.;

ii. All exceedances of the rolling, 12-month limitations on coatings and cleanup material usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and cleanup material usage levels in b)(2)d.; and

iii. All exceedances of the rolling, 12-month emission limitation for VOC in b)(1)c.

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).

f) Testing Requirements

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

a. Emission Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 131.3 pounds per hour from miscellaneous metal parts coating

Applicable Compliance Method:

If required, compliance with the short-term VOC emission limitation shall be demonstrated by Method 25 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The applicable emission limitation was established based on information supplied by the permittee in Application A0040206, September 2010, for FEPTIO P0106850. The applicable emission limitation equals the uncontrolled PTE VOC:

37.5 gallons coating/hr x 3.5 pounds VOC/gallon coating = 131.3 pounds VOC per hour

b. Emission Limitation:

Emissions of VOC shall not exceed 9.96 TPY based on a rolling, 12-month summation, from miscellaneous metal parts coating and cleanup.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be demonstrated by the recordkeeping requirement in b)(2)d.

The applicable emission limitation was established based on information supplied by the permittee in Application A0040206, September 2010, for FEPTIO P0106850:

12,750 gal Hentzen CARC Topcoat/yr x 1.0 lb VOC/gal x 1 Ton/2000 lbs = 6.38 TPY

600 gal PPG Primer Gray/yr x 3.50 lbs VOC/gal x 1 Ton/2000 lbs = 1.05 TPY

250 gal PPG White/yr x 2.75 lbs VOC/gal x 1 Ton/2000 lbs = 0.34 TPY

250 gal PPG Black/yr x 2.80 lbs VOC/gal x 1 Ton/2000 lbs = 0.35 TPY

50 gal Hentzen Black/yr x 3.50 lbs VOC/gal x 1 Ton/2000 lbs = 0.09 TPY

497 gal cleanup solvent/yr x 7.04 lbs VOC/gal x 1 Ton/2000 lbs = 1.75 TPY

Total VOC = **9.96 TPY**

c. Emission Limitations:

Coatings applied in the coating operations shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents

Coatings and cleanup materials applied in this emissions unit shall not exceed the following VOC content limits, in pounds of VOC per gallon of coating, excluding water and exempt solvents:

| | |
|---|---|
| Hentzen CARC topcoat | 1.00 pound VOC per gallon |
| PPG Primer Gray | 3.50 pounds VOC per gallon |
| PPG White | 2.75 pounds VOC per gallon |
| PPG Black | 2.80 pounds VOC per gallon |
| Hentzen Black | 3.50 pounds VOC per gallon |

| | |
|---|---|
| Cleanup solvent | 7.04 pounds VOC per gallon. |

Applicable Compliance Method:

USEPA Method 24 or other method approved by the director shall be used to determine the VOC content of each coating and cleanup material.

g) Miscellaneous Requirements

(1) None.