State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

04/23/03

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

14-09-03-0092
Pella Entry Systems
Jason Hale
7100 Dixie Highway
Fairfield, OH 45014

Dear Jason Hale:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact Hamilton County Dept. of Environmental Services.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: Hamilton County Dept. of Environmental Services
File, DAPC PMU

State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: **04/23/03**	Effective Date: **05/13/03**	Expiration Date: **05/13/08**

This document constitutes issuance of a Title V permit for Facility ID: 14-09-03-0092 to:
Pella Entry Systems
7100 Dixie Highway
Fairfield, OH 45014

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

K001 (Doorline #1 with Reverse Rollcoater)
Assembly of steel, carbon, and fiberglass doors, and steel side lights, using low-VOC adhesive.

K002 (Ransburg Paintline 1)
Steel and Carbon Door Coating

K003 (Doorline #2 with Reverse Rollcoater)
Manufacture of steel doors

K004 (Doorline #3 with Reverse Rollcoater)
Manufacture of carbon/fiberglass doors

K006 (Side Light Line)
Assembly of side lights for steel doors.

P014 (Glass Department)
Pouring of mold compound into silicone molds, and solvents used to clean glass, molds, tools; trace emissions from residual styrene monomer in resin.

R011 (Finishing Booth - SB1)
Finishing area, Spray Painting Booths

R012 (Finishing Booth - SB2)
Finishing area, Spray Painting Booths

R013 (Finishing Booth - SB3)
Finishing area, Spray Painting Booths

R014 (Finishing Booth - SB4)
Finishing area, Spray Painting Booths

R015 (Finishing Booth - SB5)
Finishing area, Spray Painting Booths

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. 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:

i. The date, place (as defined in the permit), and time of sampling or measurements.
ii. The date(s) analyses were performed.
iii. The company or entity that performed the analyses.
iv. The analytical techniques or methods used.
v. The results of such analyses.
vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

ii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) with respect to emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

(a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations ; (ii) the probable cause of such deviations; and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, the written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters. In identifying each deviation,

the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) ,(ii) and (iii))

(b) Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))

iii. **For monitoring, record keeping, and reporting requirements:**
Written reports that identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year, for the previous six calendar months. In

identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. 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.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

iv. 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

2. 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 of any emissions unit(s) or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06, 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 emissions unit(s) that is (are) served by such control system(s).
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

3. 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.
(Authority for term: OAC rule 3745-77-07(A)(4))

4. 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.
(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

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.

(Authority for term: OAC rule 3745-77-07(A)(6))

6. 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 reissuance, or modification, or for denial of a permit renewal application.

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, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. 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, reopening 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.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.
(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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.

b. 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:

   i. 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.
   ii. 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 paragraph (E) of OAC rule 3745-77-03.
   iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
   iv. 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.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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:

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

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

   i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
   ii. Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.
(b) The permittee's current compliance status.
(c) Whether compliance was continuous or intermittent.
(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.

This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)
(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the

permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.
(Authority for term: OAC rule 3745-77-07(A)(1))

B. *State Only Enforceable Section*

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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., 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.)

2. Records Retention Requirements

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.

3. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. 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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

5. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

6. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. MACT "Hammer" Requirements

The permittee may be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Metal Parts and Products, 40 CFR, Part 63, Subpart MMMM . U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts. The deadline to submit the Part I application, as specified in 40 CFR Part 63.53, was May 15, 2002.

If the final NESHAP standard is not promulgated by the deadline specified by U.S. EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted within 60 days after the deadline to promulgate the respective standard or by May 15, 2003, whichever is later. It must contain the following information, unless otherwise specified by future U.S. EPA regulations:

a. for a new affected source, the anticipated date of startup of operation;
b. the hazardous air pollutants (HAPs) emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for HAPs from the affected source;
c. any existing federal, State, or local limitations or requirements applicable to the affected source;
d. for each affected emission point or group of affected emission points, an identification of control technology in place;
e. information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor; and
f. any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to Subpart A of 40 CFR Part 63.

The Part II application for a MACT determination may, but is not required to, contain the following information:

a. recommended emission limitations for the affected source and support information (the permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation);
b. a description of the control technologies that would be applied to meet the emission limitation, including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied; and
c. relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.

A. State and Federally Enforcable Section (continued)

If the NESHAP is promulgated before the Part II application is due for the relevant source category, the permittee may be subject to the rule as an existing major source with a compliance date as specified in the NESHAP. If subject, the permittee shall submit the following notifications:

a. Unless otherwise specified in the relevant Subpart, within 120 days after promulgation of a 40 CFR Part 63 Subpart to which the source is subject, the permittee shall submit an Initial Notification Report that contains the following information, in accordance with 40 CFR Part 63.9(b)(2):

i. the name and mailing address of the permittee;

ii. the physical location of the source if it is different from the mailing address;

iii. identification of the relevant MACT standard and the source's compliance date;

iv. a brief description of the nature, design, size, and method of operation of the source, and an identification of the types of emission points within the affected source subject to the relevant standard and the types of HAPs emitted; and

v. a statement confirming the facility is a major source for HAPs.

b. Unless otherwise specified in the relevant Subpart, within 60 days following completion of any required compliance demonstration activity specified in the relevant Subpart, the permittee shall submit a notification of compliance status that contains the following information:

i. the methods used to determine compliance;

ii the results of any performance tests, visible emission observations, continuous monitoring systems performance evaluations, and/or other monitoring procedures or methods that were conducted;

iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

iv. the type and quantity of HAPs emitted by the source, reported in units and averaging times in accordance with the test methods specified in the relevant Subpart;

v. an analysis demonstrating whether the affected source is a major source or an area source;

vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each HAP and the control efficiency (percent) for each control device or method; and

vii. a statement of whether or not the permittee has complied with the requirements of the relevant Subpart.

B. State Only Enforceable Section

1.a The following insignificant emissions units are located at this facility:

Z004 Mohawk Boiler
P008 Foam Embossing
P013 Foam Embosser

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Doorline #1 with Reverse Rollcoater (K001)

Activity Description: Assembly of steel, carbon, and fiberglass doors, and steel side lights, using low-VOC adhesive.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Doorline #1 with reverse rollcoater	OAC rule 3745-31-05(A)(3) (PTI 14-05064)	2.6 lbs of organic compound (OC)/hour from the coating of non-metal parts*(excluding cleanup) 39.2 lbs of OC/hour from the coating of metal parts*(excluding cleanup) *The hourly OC emission limitations are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits. 0.38 lb of particulate emissions (PE)/PM10/hour** 1.7 tons of PE/PM10 per year (TPY) ** The PE/PM10/hr emission limitation is based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with this limit. See A.II.1 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-21-09 (U)(1)(c).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(D) (PTI 14-05064)	The total OC emissions from K001, K003, K004, and K006, combined, shall not exceed 20.0 tons per year based upon a rolling, 12-month summation (excluding cleanup). .
	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.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(1)(c)	When coating metal parts, the VOC content of each coating, as applied, shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents.
	OAC rule 3745-21-07(G)	Exempt, see A.II.1 below.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. When coating non-metal parts, the use of any photochemically reactive material (coating and/or cleanup material) in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

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

b. the type of material coated (metal or non-metal) by each coating employed;

c. for each coating used for non-metal parts, an identification as to whether or not each coating and cleanup material employed is a photochemically reactive material;

d. the total number of gallons of each coating employed;

e. the OC content of each coating employed, in pounds per gallon, as applied;

f. for each coating used for metal parts, the VOC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied; and

g. the total monthly OC emissions from all coatings employed in this emissions unit (the summation of (d) multiplied by (e) for each coating employed), in tons.

Note: The permittee may track the coating usage based on the number of doors produced and use a coating usage factor (gallons of coating used per door produced) to calculate the gallons of coating used from the number of doors manufactured. The permittee shall update the factor every six calender months using actual inventory records if such a factor is used. The calculations used to develop the coating usage factor shall maintained on file.

2. The permittee shall maintain monthly records of the following information for emissions units K001, K003, K004, and K006, combined:

a. the total monthly OC emissions (the summation of the monthly emission total recorded in term and condition A.III.1.g for each emission unit), in tons; and

b. the total rolling, 12-month summation of the OC emissions (the summation of the current month's emission total recorded in A.III.2.a plus the previous 11-month's emission totals recorded in A.III.2.a), in tons.

3. Pursuant to OAC rule 3745-77-07 (a)(3)(A)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than that contained in Permit to Install 14-05064 issued on May 16, 2002 and modified on October 24, 2002: A.III.1 through A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements of the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation specified in A.I.1 for emissions units K001, K003, K004, and K006 combined.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

2. The permittee shall notify the Hamilton County Department of Environmental Services writing of any monthly record showing the use of non-complying coatings, when coating metal parts, in this emissions unit (i.e., for VOC content). 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.

IV. Reporting Requirements (continued)

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material (coating and/or cleanup material) was employed in this emissions unit for the coating of non-metal parts. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

4. Pursuant to OAC rule 3745-77-07 (a)(3)(A)(ii), the following reporting requirements are as stringent as or more stringent that that contained in Permit to Install 14-05064 issued on May 16, 2002 and modified on October 24, 2002: A.IV.1 through A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements of the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:
Visible PE shall not exceed 20 percent opacity, as a 6-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).

1.b Emission limitations:
0.38 lb of PE/PM10/hour and 1.7 tons of PE/PM10/year

Applicable Compliance Method:
To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

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

E = particulate matter emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

Compliance with the annual PE limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividingby 2000).

V. Testing Requirements (continued)

1.c Emission limitation:
The OC content of each coating, as applied, shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents, for the coatings used for metal parts.

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.1 of these terms and conditions.

The VOC content of the coatings employed shall be determined by USEPA Method 24. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24 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.

1.d Emission limitation:
Total OC emissions from K001, K003, K004, and K006, combined, shall not exceed 20.0 tons per year based upon a rolling, 12-month summation (excluding cleanup).

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.2 of these terms and conditions.

1.e Emission limitations:
2.6 lbs of OC/hour (excluding cleanup) from the coating of non-metal parts and 39.2 lbs of OC/hour (excluding cleanup)
from the coating of metal parts

Applicable Compliance Method:
The hourly OC emission limits were established by multiplying the maximum OC content, as applied, of all the coatings (pounds/gallon) by the maximum hourly coating usage rate (gallons/hour).

If required, the permittee shall demonstrate compliance with these limits in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

1.f The permittee shall update the coating usage factor referenced in A.III.1 at the end of each calendar semi-annual period. Permittee shall calculate the number of doors manufactured in the emissions unit and the number of gallons of coatings employed in the emissions unit. The coating usage factor shall be determined by dividing the total coating usage for the emissions unit by the total number of doors manufactured in the emissions unit. The coating usage factor shall then be used to calculate emissions for the next semi-annual period.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Doorline #1 with reverse rollcoater		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Ransburg Paintline 1 (K002)

Activity Description: Steel and Carbon Door Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
steel and carbon door coating line 1	OAC rule 3745-31-05(A)(3) (PTI 14-05064)	276.0 lbs of organic compounds (OC)/day* (excluding cleanup) *The lbs/day OC emission limitation is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits. 0.23 lb of particulate emissions (PE)/PM10/hour** 1.0 ton of PE/PM10 per year (TPY) ** The PE/PM10/hr emission limitation is based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with this limit. See A.I.2.a and A.II.1 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-31-05(D) (PTI 14-05064)	40.0 tons of OC per year based upon a rolling, 12-month summation (excluding cleanup).
	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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(1)(c)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	Exempt, see A.II.1 below.

2. Additional Terms and Conditions

2.a The OC content of each coating, as applied, shall not exceed 0.6 pound per gallon, excluding water and exempt solvents.

II. Operational Restrictions

1. When coating non-metal parts, the use of any photochemically reactive material (coating and/or cleanup material), as defined in OAC rule 3745-21-01(C)(5), is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

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

b. the type of material coated (metal or non-metal) by each coating employed;

c. for each coating used for non-metal parts, an identification as to whether or not each coating and cleanup material employed is a photochemically reactive material;

d. the total number of gallons of each coating employed;

e. the OC content of each coating employed, in pounds per gallon, as applied;

f. for each coating used for metal parts, the VOC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied; and

g. the total monthly OC emissions from all coatings employed in this emissions unit (the summation of (d) multiplied by (e) for each coating employed), in tons.

h. the rolling, 12-month summation of the OC emissions (the current month's emission total recorded in A.III.1.g. plus the previous 11-month's emission totals recorded in A.III.1.g), in tons.

Note: The permittee may track the coating usage based on the number of doors produced and use a coating usage factor (gallons of coating used per door produced) to calculate the gallons of coating used from the number of doors manufactured. The permittee shall update the factor every six calender months using actual inventory records if such a factor is used. The calculations used to develop the coating usage factor shall maintained on file.

III. Monitoring and/or Record Keeping Requirements (continued)

2. Pursuant to OAC rule 3745-77-07 (a)(3)(A)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than that contained in Permit to Install 14-05064 issued on May 16, 2002 and modified on October 24, 2002: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements of the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation specified in A.I.1.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

2. The permittee shall notify the Hamilton County Department of Environmental Services writing of any monthly record showing the use of non-complying coatings, when coating metal parts, in this emissions unit (i.e. for VOC content). 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.

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material (coating and/or cleanup material) was employed in this emissions unit for the coating of non-metal parts. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

4. Pursuant to OAC rule 3745-77-07(a)(3)(A)(ii), the following reporting requirements are as stringent as or more stringent that that contained in Permit to Install 14-05064 issued on May 16, 2002 and modified on October 24, 2002: A.IV.1 through A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements of the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:
Visible PE shall not exceed 20 percent opacity, as a 6-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).

V. Testing Requirements (continued)

1.b Emission limitations:
0.23 lb of PE/PM10/hour and 1.0 ton of PE/PM10/year

Applicable Compliance Method:
To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

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

E = particulate matter emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

Compliance with the annual PE limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

1.c Emission limitation:
The OC content of each coating, as applied, shall not exceed 0.6 pound per gallon, excluding water and exempt solvents.

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.1 of these terms and conditions.

The VOC content of the coatings employed shall be determined by USEPA Method 24. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24 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.

1.d Emission limitation:
40.0 tons per year OC based upon a rolling, 12-month summation (excluding cleanup).

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.1 of these terms and conditions.

1.e Emission limitation:
270 lbs of OC/day (excluding cleanup)

Applicable Compliance Method:
The daily OC emission limitation was established by multiplying the maximum OC content, as applied, of all the coatings (pounds/gallon) by the maximum daily coating usage rate (gallons/day).

1.f The permittee shall update the coating usage factor referenced in A.III.1 at the end of each calendar semi-annual period. Permittee shall calculate the number of doors manufactured in the emissions unit and the number of gallons of coatings employed in the emissions unit. The coating usage factor shall be determined by dividing the total coating usage for the emissions unit by the total number of doors manufactured in the emissions unit. The coating usage factor shall then be used to calculate emissions for the next semi-annual period.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
steel and carbon door coating line 1		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Doorline #2 with Reverse Rollcoater (K003)

Activity Description: Manufacture of steel doors

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Doorline #2 with reverse rollcoater	OAC rule 3745-31-05(A)(3) (PTI 14-05064)	2.6 lbs of organic compound (OC)/hour from the coating of non-metal parts* (excluding cleanup) 39.2 lbs of OC/hour from the coating of metal parts* (excluding cleanup) *The hourly OC emission limitations are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits. 0.38 lb of particulate emissions (PE)/PM10/hour** 1.7 tons of PE/PM10 per year (TPY) ** The PE/PM10/hr emission limitation is based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with this limit. See A.II.1 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-21-09 (U)(1)(c).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(D) (PTI 14-05064)	The total OC emissions from K001, K003, K004, and K006, combined, shall not exceed 20.0 tons per year based upon a rolling, 12-month summation (excluding cleanup).
	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.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(1)(c)	When coating metal parts, the VOC content of each coating, as applied, shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents.
	OAC rule 3745-21-07(G)	Exempt, see A.II.1 below.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. When coating non-metal parts, the use of any photochemically reactive material (coating and/or cleanup material) in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

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

b. the type of material coated (metal or non-metal) by each coating employed;

c. for each coating used for non-metal parts, an identification as to whether or not each coating and cleanup material employed is a photochemically reactive material;

d. the total number of gallons of each coating employed;

e. the OC content of each coating employed, in pounds per gallon, as applied;

f. for each coating used for metal parts, the VOC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied; and

g. the total monthly OC emissions from all coatings employed in this emissions unit (the summation of (d) multiplied by (e) for each coating employed), in tons.

Note: The permittee may track the coating usage based on the number of doors produced and use a coating usage factor (gallons of coating used per door produced) to calculate the gallons of coating used from the number of doors manufactured. The permittee shall update the factor every six calender months using actual inventory records if such a factor is used. The calculations used to develop the coating usage factor shall maintained on file.

2. The permittee shall maintain monthly records of the following information for emissions units K001, K003, K004, and K006, combined:

a. the total monthly OC emissions (the summation of the monthly emission total recorded in term and condition A.III.1.g for each emission unit), in tons; and

b. the total rolling, 12-month summation of the OC emissions (the summation of the current month's emission total recorded in A.III.2.a plus the previous 11-month's emission totals recorded in A.III.2.a), in tons.

3. Pursuant to OAC rule 3745-77-07 (a)(3)(A)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than that contained in Permit to Install 14-05064 issued on May 16, 2002 and modified on October 24, 2002: A.III.1 through A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements of the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation specified in A.I.1 for emissions units K001, K003, K004, and K006 combined.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

2. The permittee shall notify the Hamilton County Department of Environmental Services writing of any monthly record showing the use of non-complying coatings, when coating metal parts, in this emissions unit (i.e. for VOC content). 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.

IV. Reporting Requirements (continued)

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material (coating and/or cleanup material) was employed in this emissions unit for the coating of non-metal parts. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

4. Pursuant to OAC rule 3745-77-07 (a)(3)(A)(ii), the following reporting requirements are as stringent as or more stringent that that contained in Permit to Install 14-05064 issued on May 16, 2002 and modified on October 24, 2002: A.IV.1 through A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements of the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:
Visible PE shall not exceed 20 percent opacity, as a 6-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).

1.b Emission limitations:
0.38 lb of PE/PM10/hour and 1.7 tons of PE/PM10/year

Applicable Compliance Method:
To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

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

E = particulate matter emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

Compliance with the annual PE limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividingby 2000).

V. Testing Requirements (continued)

1.c Emission limitation:
The OC content of each coating, as applied, shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents, for the coatings used for metal parts.

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.1 of these terms and conditions.

The VOC content of the coatings employed shall be determined by USEPA Method 24. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24 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.

1.d Emission limitation:
Total OC emissions from K001, K003, K004, and K006, combined, shall not exceed 20.0 tons per year based upon a rolling, 12-month summation (excluding cleanup).

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.2 of these terms and conditions.

1.e Emission limitations:
2.6 lbs of OC/hour from the coating of non-metal parts and 39.2 lbs of OC/hour from the coating of metal parts

Applicable Compliance Method:
The hourly OC emission limits were established by multiplying the maximum OC content, as applied, of all the coatings (pounds/gallon) by the maximum hourly coating usage rate (gallons/hour).

If required, the permittee shall demonstrate compliance with these limits in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

1.f The permittee shall update the coating usage factor referenced in A.III.1 at the end of each calendar semi-annual period. Permittee shall calculate the number of doors manufactured in the emissions unit and the number of gallons of coatings employed in the emissions unit. The coating usage factor shall be determined by dividing the total coating usage for the emissions unit by the total number of doors manufactured in the emissions unit. The coating usage factor shall then be used to calculate emissions for the next semi-annual period.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Doorline #2 with reverse rollcoater		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Doorline #3 with Reverse Rollcoater (K004)

Activity Description: Manufacture of carbon/fiberglass doors

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Doorline #3 with reverse rollcoater	OAC rule 3745-31-05(A)(3) (PTI 14-05064)	2.6 lbs of organic compound (OC)/hour from the coating of non-metal parts* (excluding cleanup) 39.2 lbs of OC/hour from the coating of metal parts* (excluding cleanup) *The hourly OC emission limitations are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits. 0.38 lb of particulate emissions (PE)/PM10/hour** 1.7 tons of PE/PM10 per year (TPY) ** The PE/PM10/hr emission limitation is based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with this limit. See A.II.1 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-21-09 (U)(1)(c).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(D) (PTI 14-05064)	The total OC emissions from K001, K003, K004, and K006, combined, shall not exceed 20.0 tons per year based upon a rolling, 12-month summation (excluding cleanup).
	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.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(1)(c)	When coating metal parts, the VOC content of each coating, as applied, shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents.
	OAC rule 3745-21-07(G)	Exempt, see A.II.1 below.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. When coating non-metal parts, the use of any photochemically reactive material (coating and/or cleanup material) in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

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

b. the type of material coated (metal or non-metal) by each coating employed;

c. for each coating used for non-metal parts, an identification as to whether or not each coating and cleanup material employed is a photochemically reactive material;

d. the total number of gallons of each coating employed;

e. the OC content of each coating employed, in pounds per gallon, as applied;

f. for each coating used for metal parts, the VOC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied; and

g. the total monthly OC emissions from all coatings employed in this emissions unit (the summation of (d) multiplied by (e) for each coating employed), in tons.

Note: The permittee may track the coating usage based on the number of doors produced and use a coating usage factor (gallons of coating used per door produced) to calculate the gallons of coating used from the number of doors manufactured. The permittee shall update the factor every six calender months using actual inventory records if such a factor is used. The calculations used to develop the coating usage factor shall maintained on file.

2. The permittee shall maintain monthly records of the following information for emissions units K001, K003, K004, and K006, combined:

a. the total monthly OC emissions (the summation of the monthly emission total recorded in term and condition A.III.1.g for each emission unit), in tons; and

b. the total rolling, 12-month summation of the OC emissions (the summation of the current month's emission total recorded in A.III.2.a plus the previous 11-month's emission totals recorded in A.III.2.a), in tons.

3. Pursuant to OAC rule 3745-77-07 (a)(3)(A)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than that contained in Permit to Install 14-05064 issued on May 16, 2002 and modified on October 24, 2002: A.III.1 through A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements of the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation specified in A.I.1 for emissions units K001, K003, K004, and K006 combined.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

2. The permittee shall notify the Hamilton County Department of Environmental Services writing of any monthly record showing the use of non-complying coatings, when coating metal parts, in this emissions unit (i.e. for VOC content). 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.

IV. Reporting Requirements (continued)

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material (coating and/or cleanup material) was employed in this emissions unit for the coating of non-metal parts. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

4. Pursuant to OAC rule 3745-77-07 (a)(3)(A)(ii), the following reporting requirements are as stringent as or more stringent that that contained in Permit to Install 14-05064 issued on May 16, 2002 and modified on October 24, 2002: A.IV.1 through A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements of the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:
Visible PE shall not exceed 20 percent opacity, as a 6-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).

1.b Emission limitations:
0.38 lb of PE/PM10/hour and 1.7 tons of PE/PM10/year

Applicable Compliance Method:
To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

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

E = particulate matter emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

Compliance with the annual PE limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividingby 2000).

V. Testing Requirements (continued)

1.c Emission limitation:
The OC content of each coating, as applied, shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents, for the coatings used for metal parts.

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.1 of these terms and conditions.

The VOC content of the coatings employed shall be determined by USEPA Method 24. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24 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.

1.d Emission limitation:
Total OC emissions from K001, K003, K004, and K006, combined, shall not exceed 20.0 tons per year based upon a rolling, 12-month summation (excluding cleanup).

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.2 of these terms and conditions.

1.e Emission limitations:
2.6 lbs of OC/hour from the coating of non-metal parts and 39.2 lbs of OC/hour from the coating of metal parts

Applicable Compliance Method:
The hourly OC emission limits were established by multiplying the maximum OC content, as applied, of all the coatings (pounds/gallon) by the maximum hourly coating usage rate (gallons/hour).

If required, the permittee shall demonstrate compliance with these limits in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

1.f The permittee shall update the coating usage factor referenced in A.III.1 at the end of each calendar semi-annual period. Permittee shall calculate the number of doors manufactured in the emissions unit and the number of gallons of coatings employed in the emissions unit. The coating usage factor shall be determined by dividing the total coating usage for the emissions unit by the total number of doors manufactured in the emissions unit. The coating usage factor shall then be used to calculate emissions for the next semi-annual period.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Doorline #3 with reverse rollcoater		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Side Light Line (K006)

Activity Description: Assembly of side lights for steel doors.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
side light assembly coating for steel door	OAC rule 3745-31-05(A)(3) (PTI 14-05064)	2.6 lbs of organic compound (OC)/hour from the coating of non-metal parts* (excluding cleanup) 39.2 lbs of OC/hour from the coating of metal parts* (excluding cleanup) *The hourly OC emission limitations are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits. 0.38 lb of particulate emissions (PE)/PM10/hour** 1.7 tons of PE/PM10 per year (TPY) ** The PE/PM10/hr emission limitation is based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with this limit. See A.II.1 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-21-09 (U)(1)(c).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(D) (PTI 14-05064)	The total OC emissions from K001, K003, K004, and K006, combined, shall not exceed 20.0 tons per year based upon a rolling, 12-month summation (excluding cleanup). See A.I.2.a.
	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.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(1)(c)	When coating metal parts, the VOC content of each coating, as applied, shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents.
	OAC rule 3745-21-07(G)	Exempt, see A.II.1 below.

2. Additional Terms and Conditions

2.a The emission of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from K006 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 based on a rolling, 12-month summation.

II. Operational Restrictions

1. When coating non-metal parts, the use of photochemically reactive material (coating and/or cleanup material) as defined in OAC rule 3745-21-01(C)(5) is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

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

b. the type of material coated (metal or non-metal) by each coating employed;

c. for each coating used for non-metal parts, an identification as to whether or not each coating and cleanup material employed is a photochemically reactive material;

d. the total number of gallons of each coating employed;

e. the OC content of each coating employed, in pounds per gallon, as applied;

f. for each coating used for metal parts, the VOC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied; and

g. the total monthly OC emissions from all coatings employed in this emissions unit (the summation of (d) multiplied by (e) for each coating employed), in tons.

Note: The permittee may track the coating usage based on the number of doors produced and use a coating usage factor (gallons of coating used per door produced) to calculate the gallons of coating used from the number of doors manufactured. The permittee shall update the factor every six calender months using actual inventory records if such a factor is used. The calculations used to develop the coating usage factor shall maintained on file.

2. The permittee shall maintain monthly records of the following information for emissions units K001, K003, K004, and K006, combined:

a. the total monthly OC emissions (the summation of the monthly emission total recorded in term and condtion A.III.1.g for each emission unit), in tons; and

b. the total rolling, 12-month summation of the OC emissions (the summation of the current month's emission total recorded in A.III.2.a plus the previous 11-month's emission totals recorded in A.III.2.a), in tons.

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each month for this emissions unit:

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

b. the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

c. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];

d. the number of gallons of each coating employed;

e. the name and identification of each cleanup material employed;

f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];

h. the number of gallons of each cleanup material employed;

i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];

j. the total combined HAPs emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];

k. the updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons (this shall include the information for the current month and the preceding eleven calender months); and

l. the updated rolling, 12-month summation for total combined HAPs emissions, in pounds or tons (this shall include the information for the current month and the preceding eleven calender months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

4. Pursuant to OAC rule 3745-77-07 (a)(3)(A)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than that contained in Permit to Install 14-05064 issued on May 16, 2002 and modified on October 24, 2002: A.III.1 through A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements of the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation specified in A.I.1 for emissions units K001, K003, K004, and K006 combined.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

IV. Reporting Requirements (continued)

2. The permittee shall notify the Hamilton County Department of Environmental Services writing of any monthly record showing the use of non-complying coatings, when coating metal parts, in this emissions unit (i.e. for VOC content). 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.

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material (coating and/or cleanup material) was employed in this emissions unit for the coating of non-metal parts. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the HAP emission limitations specified in A.I.2.a of these terms and condtions.

5. Pursuant to OAC rule 3745-77-07 (a)(3)(A)(ii), the following reporting requirements are as stringent as or more stringent that that contained in Permit to Install 14-05064 issued on May 16, 2002 and modified on October 24, 2002: A.IV.1 through A.IV.4. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements of the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:
Visible PE shall not exceed 20 percent opacity, as a 6-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).

1.b Emission limitations:
0.38 lb of PE/PM10/hour and 1.7 tons of PE/PM10/year

Applicable Compliance Method:
To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

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

E = particulate matter emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

Compliance with the annual PE limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividingby 2000).

V. Testing Requirements (continued)

1.c Emission limitation:
The OC content of each coating, as applied, shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents, for the coatings used for metal parts.

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.1 of these terms and conditions.

The VOC content of the coatings employed shall be determined by USEPA Method 24. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24 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.

1.d Emission limitation:
Total OC emissions from K001, K003, K004, and K006, combined, shall not exceed 20.0 tons per year based upon a rolling, 12-month summation (excluding cleanup).

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.2 of these terms and conditions.

1.e Emission limitation:
2.6 lbs of OC/hour from the coating of non-metal parts and 39.2 lbs of OC/hour from the coating of metal parts

Applicable Compliance Method:
The hourly OC emission limits were established by multiplying the maximum OC content, as applied, of all the coatings (pounds/gallon) by the maximum hourly coating usage rate (gallons/hour).

If required, the permittee shall demonstrate compliance with these limits in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

1.f Emission limitation:
9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.3 of these terms and conditions.

Formulation data or USEPA Method 24 shall be used to determine the HAP content of the coatings and cleanup materials.

1.g The permittee shall update the coating usage factor referenced in A.III.1 at the end of each calendar semi-annual period. Permittee shall calculate the number of doors manufactured in the emissions unit and the number of gallons of coatings employed in the emissions unit. The coating usage factor shall be determined by dividing the total coating usage for the emissions unit by the total number of doors manufactured in the emissions unit. The coating usage factor shall then be used to calculate emissions for the next semi-annual period.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
side light assembly coating for steel door		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Glass Department (P014)

Activity Description: Pouring of mold compound into silicone molds, and solvents used to clean glass, molds, tools; trace emissions from residual styrene monomer in resin.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
glass line	OAC rule 3745-31-05(A)(3) (PTI 14-05064)	The organic compound (OC) emissions from resins employed in this emissions unit shall not exceed 0.51 lb/hr or 12.2 lbs /day.* *The hourly and daily OC emission limitations are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits. The OC emissions from cleanup materials employed in this emissions unit shall not exceed 1320 lbs/month. See A.II.3 below.
	OAC rule 3745-31-05(D) (PTI 14-05064)	The OC emissions from the resin usage in this emissions unit shall not exceed 2.20 tons per year based upon a rolling, 12-month summation. The OC emissions from the cleanup materials employed in this emissions unit shall not exceed 7.8 tons per year based upon a rolling, 12-month summation.
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The maximum annual resin usage in this emissions unit shall not exceed 52,560 gallons per year based upon a rolling, 12-month summation of the resin usage figures.

2. The maximum annual cleanup material usage in this emissions unit shall not exceed 3,200 gallons per year based upon a rolling, 12-month summation of the cleanup usage figures.

3. The use of any cleanup material that is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

a. the name of each resin and cleanup material employed;

b. for each cleanup material employed, documentation as to whether the cleanup material is a photochemically reactive material;

c . the total number of gallons of each resin and cleanup material employed;

d. the OC content of each resin and cleanup material employed, in pounds per gallon, as applied;

e. the monthly total for the number of pieces of glass processed;

f. the total monthly OC emissions from all resin materials employed, in pounds (the OC emissions from the resins employed shall be calculated by multiplying the number of pieces of glass processed by 1 pound to determine the amount of excess resin in pounds and multiplying the excess resin by an emission factor of 0.035 [the 3.5% emission factor is based upon manufacturer estimates]);

g. the total monthly OC emissions from all cleanup materials employed, in pounds (the OC emissions from the cleanup materials employed shall be calculated as the summation of (c) multiplied by (d) for each cleanup material employed);

h. the rolling, 12-month summation of OC emissions from all the resin materials employed and from all the cleanup materials employed, separately, in tons (the summation of the current month's emission total recorded in A.III.1.f and A.III.1.g, respectively, plus the previous 11-month's emission totals recorded in A.III.1.f and A.III.1.g, respectively); and

i. the rolling, 12-month summations of resin materials usage and of cleanup materials usage in this emissions unit, recorded separately in gallons (the summation of the current month's usage total recorded in A.III.1.c. plus the previous 11-month's usage totals recorded in A.III.1.c.).

2. Pursuant to OAC rule 3745-77-07 (a)(3)(A)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than that contained in Permit to Install 14-05064 issued on May 16, 2002 and modified on October 24, 2002: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements of the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitations specified in A.I.1.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly OC emission limit of 1320 pounds from cleanup materials as specified in A.I.1.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month material usage limitations specified in A.II.1. and A.II.2.

4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

5. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material was employed as a cleanup material. This report shall identify the cause for the use of the photochemically reactive material(s) as a cleanup material and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

6. Pursuant to OAC rule 3745-77-07 (a)(3)(A)(ii), the following reporting requirements are as stringent as or more stringent that that contained in Permit to Install 14-05064 issued on May 16, 2002 and modified on October 24, 2002: A.IV.1 through A.IV.5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements of the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission limitations:
OC emissions from resin usage shall not exceed 2.20 tons per year based upon a rolling, 12-month summation.

OC emissions from clean-up material employed shall not exceed 7.8 tons per year based upon a rolling, 12-month summation.

OC emissions from clean-up material employed shall not exceed 1320 lbs/month.

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.1.e and A.III.1.f of these terms and conditions.

1.b Emission limitations:
OC emissions from resin employed in this emissions unit shall not exceed 0.51 lb/hr or 12.2 lbs /day.

Applicable Compliance Method:
The hourly OC emission limitation was established by multiplying the maximum OC content, as applied, of all the resins (pounds/gallon) by the maximum hourly resin excess (gallons/hour) and then multiplying by an emission factor of 3.5% (emission factor based upon manufacturer testing).

The emission factor of 3.5% is based on a study conducted by the permittee in which the permittee measured the amount of resin dispensed and the amount of resin on the final piece of glass for a variety of different sizes of glass pieces. The average amount of resin spilled was calculated to be 1.006 lbs of resin spilled/piece of glass. The resin manufacturer estimates that 3.5 wt % of the resin evaporates as OC if the resin is left to cure.

If required, the permittee shall demonstrate compliance with the hourly limit in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

The daily OC emission limitation was established by multiplying the maximum OC content, as applied, of all the resins (pounds/gallon) by the maximum daily resin excess (gallons/day) and then multiplying by an emission factor of 3.5% (emission factor based upon manufacturer testing).

V. Testing Requirements (continued)

1.c Material Usage limitations:
Annual resin usage in this emissions unit shall not exceed 52,560 gallons per year based upon a rolling, 12-month summation.

Annual clean-up material usage in this emissions unit shall not exceed 3,200 gallons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.1.g of these terms and conditions.

1.d The VOC content of the coatings and cleanup materials employed shall be determined by USEPA Method 24. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24 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.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
glass line		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. The permit to install for this emissions unit P014 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant : Styrene

TLV (ug/m3): 85,200

Maximum Hourly Emission Rate (lbs/hr): 0.42

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 35.1

MAGLC (ug/m3): 2028.6

VI. Miscellaneous Requirements (continued)

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Finishing Booth - SB1 (R011)

Activity Description: Finishing area, Spray Painting Booths

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
finishing booth - SB1	OAC rule 3745-31-05(A)(3) (PTI 14-05064)	293 lbs of organic compounds (OC)/day from the coating of non-metal parts* (excluding cleanup) 210 lbs of OC/day from the coating of metal parts* (excluding cleanup) *The daily OC emission limitation is based upon the emissions unit's potential to emit. Therefore, no daily records are required to demonstrate compliance with this limit. 0.1 lb of particulate emissions (PE)/PM10/hour** 0.44 ton of PE/PM10 per year (TPY) ** The PE/PM10/hr emission limitation is based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with this limit. See A.II.1 and A.II.2 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-21-09 (U)(1)(c).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(D) (PTI 14-05064)	The total OC emissions from R011 thru R015, combined, shall not exceed 18.0 tons per year based upon a rolling, 12-month summation (excluding cleanup).
	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.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(1)(c)	When coating metal parts, the VOC content of each coating, as applied, shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents.
	OAC rule 3745-21-07(G)	Exempt, see A.II.2 below.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. When coating non-metal parts, the OC content of each coating, as applied, shall not exceed 7.3 pounds per gallon.

2. When coating non-metal parts, the use of any photochemically reactive material (coating and/or cleanup material) in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

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

b. the type of material coated (metal or non-metal) by each coating employed;

c. for each coating used for non-metal parts, an identification as to whether or not each coating and cleanup material employed is a photochemically reactive material;

d. the total number of gallons of each coating employed;

e. the OC content of each coating employed, in pounds per gallon, as applied;

f. for each coating used for metal parts, the VOC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied; and

g. the total monthly OC emissions from all coatings employed in this emissions unit (the summation of (d) multiplied by (e) for each coating employed), in tons.

2. The permittee shall maintain monthly records of the following information for emissions units R011 thru R015, combined:

a. the total monthly OC emissions (the summation of the monthly emission total recorded in term and condition A.III.1.g for each emissions unit), in tons; and

b. the total rolling, 12-month summation of the OC emissions (the summation of the current month's emission total recorded in A.III.2.a plus the previous 11-month's emission totals recorded in A.III.2.a), in tons.

3. Pursuant to OAC rule 3745-77-07 (a)(3)(A)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than that contained in Permit to Install 14-05064 issued on May 16, 2002 and modified on October 24, 2002: A.III.1 through A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements of the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation specified in A.I.1 for emissions units R011 thru R015 combined.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements as specified in Part I - General Term and Condition A.1.c.ii.

2. The permittee shall notify the Hamilton County Department of Environmental Services writing of any monthly record showing the use of non-complying coatings, when coating metal parts, in this emissions unit (i.e., for VOC content). 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.

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material (coating and/or cleanup material) was employed in this emissions unit for the coating of non-metal parts. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

IV. Reporting Requirements (continued)

4. Pursuant to OAC rule 3745-77-07 (a)(3)(A)(ii), the following reporting requirements are as stringent as or more stringent that that contained in Permit to Install 14-05064 issued on May 16, 2002 and modified on October 24, 2002: A.IV.1 through A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements of the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:
Visible PE shall not exceed 20 percent opacity, as a 6-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).

1.b Emission limitations:
0.1 lb of PE/PM10/hour and 0.44 ton of PE/PM10/year

Applicable Compliance Method:
To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

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

E = particulate matter emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

Compliance with the annual PE limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividingby 2000).

1.c Emission limitation:
The OC content of each coating, as applied, shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents, for the coatings used for metal parts.

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.1 of these terms and conditions.

The VOC content of the coatings employed shall be determined by USEPA Method 24. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24 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.

V. Testing Requirements (continued)

1.d Emission limitation:
Total OC emissions from R011 thru R015, combined, shall not exceed 18.0 tons per year based upon a rolling, 12-month summation (excluding cleanup).

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.2 of these terms and conditions.

1.e Emission limitation:
293 lbs of OC/day from the coating of non-metal parts and
210 lbs of OC/day from the coating of metal parts

Applicable Compliance Method:
The daily OC emission limits were established by multiplying the maximum OC content, as applied, of all the coatings (pounds/gallon) by the maximum daily coating usage rate (gallons/day).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
finishing booth - SB1		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant : Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 17.4

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 478.8

MAGLC (ug/m3): 4485.7

VI. Miscellaneous Requirements (continued)

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Finishing Booth - SB2 (R012)

Activity Description: Finishing area, Spray Painting Booths

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
finishing booth - SB2	OAC rule 3745-31-05(A)(3) (PTI 14-05064)	293 lbs of organic compounds (OC)/day from the coating of non-metal parts* (excluding cleanup) 210 lbs of OC/day from the coating of metal parts* (excluding cleanup) *The daily OC emission limitation is based upon the emissions unit's potential to emit. Therefore, no daily records are required to demonstrate compliance with this limit. 0.1 lb of particulate emissions (PE)/PM10/hour** 0.44 ton of PE/PM10 per year (TPY) ** The PE/PM10/hr emission limitation is based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with this limit. See A.II.1 and A.II.2 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-21-09 (U)(1)(c).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(D) (PTI 14-05064)	The total OC emissions from R011 thru R015, combined, shall not exceed 18.0 tons per year based upon a rolling, 12-month summation (excluding cleanup).
	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.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(1)(c)	When coating metal parts, the VOC content of each coating, as applied, shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents.
	OAC rule 3745-21-07(G)	Exempt, see A.II.2 below.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. When coating non-metal parts, the OC content of each coating, as applied, shall not exceed 7.3 pounds per gallon.

2. When coating non-metal parts, the use of any photochemically reactive material (coating and/or cleanup material) in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

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

b. the type of material coated (metal or non-metal) by each coating employed;

c. for each coating used for non-metal parts, an identification as to whether or not each coating and cleanup material employed is a photochemically reactive material;

d. the total number of gallons of each coating employed;

e. the OC content of each coating employed, in pounds per gallon, as applied;

f. for each coating used for metal parts, the VOC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied; and

g. the total monthly OC emissions from all coatings employed in this emissions unit (the summation of (d) multiplied by (e) for each coating employed), in tons.

2. The permittee shall maintain monthly records of the following information for emissions units R011 thru R015, combined:

a. the total monthly OC emissions (the summation of the monthly emission total recorded in term and condition A.III.1.g for each emissions unit), in tons; and

b. the total rolling, 12-month summation of the OC emissions (the summation of the current month's emission total recorded in A.III.2.a plus the previous 11-month's emission totals recorded in A.III.2.a), in tons.

3. Pursuant to OAC rule 3745-77-07 (a)(3)(A)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than that contained in Permit to Install 14-05064 issued on May 16, 2002 and modified on October 24, 2002: A.III.1 through A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements of the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation specified in A.I.1 for emissions units R011 thru R015 combined.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements as specified in Part I - General Term and Condition A.1.c.ii.

2. The permittee shall notify the Hamilton County Department of Environmental Services writing of any monthly record showing the use of non-complying coatings, when coating metal parts, in this emissions unit (i.e., for VOC content). 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.

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material (coating and/or cleanup material) was employed in this emissions unit for the coating of non-metal parts. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

IV. Reporting Requirements (continued)

4. Pursuant to OAC rule 3745-77-07 (a)(3)(A)(ii), the following reporting requirements are as stringent as or more stringent that that contained in Permit to Install 14-05064 issued on May 16, 2002 and modified on October 24, 2002: A.IV.1 through A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements of the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:
Visible PE shall not exceed 20 percent opacity, as a 6-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).

1.b Emission limitations:
0.1 lb of PE/PM10/hour and 0.44 ton of PE/PM10/year

Applicable Compliance Method:
To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

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

E = particulate matter emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

Compliance with the annual PE limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividingby 2000).

1.c Emission limitation:
The OC content of each coating, as applied, shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents, for the coatings used for metal parts.

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.1 of these terms and conditions.

The VOC content of the coatings employed shall be determined by USEPA Method 24. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24 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.

V. Testing Requirements (continued)

1.d Emission limitation:
Total OC emissions from R011 thru R015, combined, shall not exceed 18.0 tons per year based upon a rolling, 12-month summation (excluding cleanup).

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.2 of these terms and conditions.

1.e Emission limitation:
293 lbs of OC/day from the coating of non-metal parts and
210 lbs of OC/day from the coating of metal parts

Applicable Compliance Method:
The daily OC emission limits were established by multiplying the maximum OC content, as applied, of all the coatings (pounds/gallon) by the maximum daily coating usage rate (gallons/day).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
finishing booth - SB2		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant : Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 17.4

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 478.8

MAGLC (ug/m3): 4485.7

VI. Miscellaneous Requirements (continued)

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Finishing Booth - SB3 (R013)

Activity Description: Finishing area, Spray Painting Booths

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
finishing booth - SB3	OAC rule 3745-31-05(A)(3) (PTI 14-05064)	293 lbs of organic compounds (OC)/day from the coating of non-metal parts* (excluding cleanup) 210 lbs of OC/day from the coating of metal parts* (excluding cleanup) *The daily OC emission limitation is based upon the emissions unit's potential to emit. Therefore, no daily records are required to demonstrate compliance with this limit. 0.1 lb of particulate emissions (PE)/PM10/hour** 0.44 ton of PE/PM10 per year (TPY) ** The PE/PM10/hr emission limitation is based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with this limit. See A.II.1 and A.II.2 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-21-09 (U)(1)(c).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(D) (PTI 14-05064)	The total OC emissions from R011 thru R015, combined, shall not exceed 18.0 tons per year based upon a rolling, 12-month summation (excluding cleanup).
	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.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(1)(c)	When coating metal parts, the VOC content of each coating, as applied, shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents.
	OAC rule 3745-21-07(G)	Exempt, see A.II.2 below.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. When coating non-metal parts, the OC content of each coating, as applied, shall not exceed 7.3 pounds per gallon.

2. When coating non-metal parts, the use of any photochemically reactive material (coating and/or cleanup material) in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

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

b. the type of material coated (metal or non-metal) by each coating employed;

c. for each coating used for non-metal parts, an identification as to whether or not each coating and cleanup material employed is a photochemically reactive material;

d. the total number of gallons of each coating employed;

e. the OC content of each coating employed, in pounds per gallon, as applied;

f. for each coating used for metal parts, the VOC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied; and

g. the total monthly OC emissions from all coatings employed in this emissions unit (the summation of (d) multiplied by (e) for each coating employed), in tons.

2. The permittee shall maintain monthly records of the following information for emissions units R011 thru R015, combined:

a. the total monthly OC emissions (the summation of the monthly emission total recorded in term and condition A.III.1.g for each emissions unit), in tons; and

b. the total rolling, 12-month summation of the OC emissions (the summation of the current month's emission total recorded in A.III.2.a plus the previous 11-month's emission totals recorded in A.III.2.a), in tons.

3. Pursuant to OAC rule 3745-77-07 (a)(3)(A)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than that contained in Permit to Install 14-05064 issued on May 16, 2002 and modified on October 24, 2002: A.III.1 through A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements of the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation specified in A.I.1 for emissions units R011 thru R015 combined.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements as specified in Part I - General Term and Condition A.1.c.ii.

2. The permittee shall notify the Hamilton County Department of Environmental Services writing of any monthly record showing the use of non-complying coatings, when coating metal parts, in this emissions unit (i.e., for VOC content). 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.

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material (coating and/or cleanup material) was employed in this emissions unit for the coating of non-metal parts. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

IV. Reporting Requirements (continued)

4. Pursuant to OAC rule 3745-77-07 (a)(3)(A)(ii), the following reporting requirements are as stringent as or more stringent that that contained in Permit to Install 14-05064 issued on May 16, 2002 and modified on October 24, 2002: A.IV.1 through A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements of the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:
Visible PE shall not exceed 20 percent opacity, as a 6-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).

1.b Emission limitations:
0.1 lb of PE/PM10/hour and 0.44 ton of PE/PM10/year

Applicable Compliance Method:
To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

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

E = particulate matter emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

Compliance with the annual PE limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividingby 2000).

1.c Emission limitation:
The OC content of each coating, as applied, shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents, for the coatings used for metal parts.

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.1 of these terms and conditions.

The VOC content of the coatings employed shall be determined by USEPA Method 24. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24 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.

V. Testing Requirements (continued)

1.d Emission limitation:
Total OC emissions from R011 thru R015, combined, shall not exceed 18.0 tons per year based upon a rolling, 12-month summation (excluding cleanup).

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.2 of these terms and conditions.

1.e Emission limitation:
293 lbs of OC/day from the coating of non-metal parts and
210 lbs of OC/day from the coating of metal parts

Applicable Compliance Method:
The daily OC emission limits were established by multiplying the maximum OC content, as applied, of all the coatings (pounds/gallon) by the maximum daily coating usage rate (gallons/day).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
finishing booth - SB3		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant : Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 17.4

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 478.8

MAGLC (ug/m3): 4485.7

VI. Miscellaneous Requirements (continued)

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Finishing Booth - SB4 (R014)

Activity Description: Finishing area, Spray Painting Booths

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
finishing booth - SB4	OAC rule 3745-31-05(A)(3) (PTI 14-05064)	293 lbs of organic compounds (OC)/day from the coating of non-metal parts* (excluding cleanup) 210 lbs of OC/day from the coating of metal parts* (excluding cleanup) *The daily OC emission limitation is based upon the emissions unit's potential to emit. Therefore, no daily records are required to demonstrate compliance with this limit. 0.1 lb of particulate emissions (PE)/PM10/hour** 0.44 ton of PE/PM10 per year (TPY) ** The PE/PM10/hr emission limitation is based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with this limit. See A.II.1 and A.II.2 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-21-09 (U)(1)(c).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(D) (PTI 14-05064)	The total OC emissions from R011 thru R015, combined, shall not exceed 18.0 tons per year based upon a rolling, 12-month summation (excluding cleanup).
	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.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(1)(c)	When coating metal parts, the VOC content of each coating, as applied, shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents.
	OAC rule 3745-21-07(G)	Exempt, see A.II.2 below.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. When coating non-metal parts, the OC content of each coating, as applied, shall not exceed 7.3 pounds per gallon.

2. When coating non-metal parts, the use of any photochemically reactive material (coating and/or cleanup material) in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

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

b. the type of material coated (metal or non-metal) by each coating employed;

c. for each coating used for non-metal parts, an identification as to whether or not each coating and cleanup material employed is a photochemically reactive material;

d. the total number of gallons of each coating employed;

e. the OC content of each coating employed, in pounds per gallon, as applied;

f. for each coating used for metal parts, the VOC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied; and

g. the total monthly OC emissions from all coatings employed in this emissions unit (the summation of (d) multiplied by (e) for each coating employed), in tons.

2. The permittee shall maintain monthly records of the following information for emissions units R011 thru R015, combined:

a. the total monthly OC emissions (the summation of the monthly emission total recorded in term and condition A.III.1.g for each emissions unit), in tons; and

b. the total rolling, 12-month summation of the OC emissions (the summation of the current month's emission total recorded in A.III.2.a plus the previous 11-month's emission totals recorded in A.III.2.a), in tons.

3. Pursuant to OAC rule 3745-77-07 (a)(3)(A)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than that contained in Permit to Install 14-05064 issued on May 16, 2002 and modified on October 24, 2002: A.III.1 through A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements of the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation specified in A.I.1 for emissions units R011 thru R015 combined.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements as specified in Part I - General Term and Condition A.1.c.ii.

2. The permittee shall notify the Hamilton County Department of Environmental Services writing of any monthly record showing the use of non-complying coatings, when coating metal parts, in this emissions unit (i.e., for VOC content). 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.

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material (coating and/or cleanup material) was employed in this emissions unit for the coating of non-metal parts. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

IV. Reporting Requirements (continued)

4. Pursuant to OAC rule 3745-77-07 (a)(3)(A)(ii), the following reporting requirements are as stringent as or more stringent that that contained in Permit to Install 14-05064 issued on May 16, 2002 and modified on October 24, 2002: A.IV.1 through A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements of the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:
Visible PE shall not exceed 20 percent opacity, as a 6-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).

1.b Emission limitations:
0.1 lb of PE/PM10/hour and 0.44 ton of PE/PM10/year

Applicable Compliance Method:
To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

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

E = particulate matter emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

Compliance with the annual PE limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividingby 2000).

1.c Emission limitation:
The OC content of each coating, as applied, shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents, for the coatings used for metal parts.

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.1 of these terms and conditions.

The VOC content of the coatings employed shall be determined by USEPA Method 24. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24 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.

V. Testing Requirements (continued)

1.d Emission limitation:
Total OC emissions from R011 thru R015, combined, shall not exceed 18.0 tons per year based upon a rolling, 12-month summation (excluding cleanup).

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.2 of these terms and conditions.

1.e Emission limitation:
293 lbs of OC/day from the coating of non-metal parts and
210 lbs of OC/day from the coating of metal parts

Applicable Compliance Method:
The daily OC emission limits were established by multiplying the maximum OC content, as applied, of all the coatings (pounds/gallon) by the maximum daily coating usage rate (gallons/day).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
finishing booth - SB4		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant : Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 17.4

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 478.8

MAGLC (ug/m3): 4485.7

VI. Miscellaneous Requirements (continued)

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Finishing Booth - SB5 (R015)

Activity Description: Finishing area, Spray Painting Booths

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
finishing booth - SB5	OAC rule 3745-31-05(A)(3) (PTI 14-05064)	293 lbs of organic compounds (OC)/day from the coating of non-metal parts* (excluding cleanup) 210 lbs of OC/day from the coating of metal parts* (excluding cleanup) *The daily OC emission limitation is based upon the emissions unit's potential to emit. Therefore, no daily records are required to demonstrate compliance with this limit. 0.1 lb of particulate emissions (PE)/PM10/hour** 0.44 ton of PE/PM10 per year (TPY) ** The PE/PM10/hr emission limitation is based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with this limit. See A.II.1 and A.II.2 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-21-09 (U)(1)(c).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(D) (PTI 14-05064)	The total OC emissions from R011 thru R015, combined, shall not exceed 18.0 tons per year based upon a rolling, 12-month summation (excluding cleanup).
	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.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(1)(c)	When coating metal parts, the VOC content of each coating, as applied, shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents.
	OAC rule 3745-21-07(G)	Exempt, see A.II.2 below.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. When coating non-metal parts, the OC content of each coating, as applied, shall not exceed 7.3 pounds per gallon.

2. When coating non-metal parts, the use of any photochemically reactive material (coating and/or cleanup material) in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

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

b. the type of material coated (metal or non-metal) by each coating employed;

c. for each coating used for non-metal parts, an identification as to whether or not each coating and cleanup material employed is a photochemically reactive material;

d. the total number of gallons of each coating employed;

e. the OC content of each coating employed, in pounds per gallon, as applied;

f. for each coating used for metal parts, the VOC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied; and

g. the total monthly OC emissions from all coatings employed in this emissions unit (the summation of (d) multiplied by (e) for each coating employed), in tons.

2. The permittee shall maintain monthly records of the following information for emissions units R011 thru R015, combined:

a. the total monthly OC emissions (the summation of the monthly emission total recorded in term and condition A.III.1.g for each emissions unit), in tons; and

b. the total rolling, 12-month summation of the OC emissions (the summation of the current month's emission total recorded in A.III.2.a plus the previous 11-month's emission totals recorded in A.III.2.a), in tons.

3. Pursuant to OAC rule 3745-77-07 (a)(3)(A)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than that contained in Permit to Install 14-05064 issued on May 16, 2002 and modified on October 24, 2002: A.III.1 through A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements of the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation specified in A.I.1 for emissions units R011 thru R015 combined.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements as specified in Part I - General Term and Condition A.1.c.ii.

2. The permittee shall notify the Hamilton County Department of Environmental Services writing of any monthly record showing the use of non-complying coatings, when coating metal parts, in this emissions unit (i.e., for VOC content). 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.

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material (coating and/or cleanup material) was employed in this emissions unit for the coating of non-metal parts. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

IV. Reporting Requirements (continued)

4. Pursuant to OAC rule 3745-77-07 (a)(3)(A)(ii), the following reporting requirements are as stringent as or more stringent that that contained in Permit to Install 14-05064 issued on May 16, 2002 and modified on October 24, 2002: A.IV.1 through A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements of the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:
Visible PE shall not exceed 20 percent opacity, as a 6-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).

1.b Emission limitations:
0.1 lb of PE/PM10/hour and 0.44 ton of PE/PM10/year

Applicable Compliance Method:
To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

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

E = particulate matter emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

Compliance with the annual PE limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividingby 2000).

1.c Emission limitation:
The OC content of each coating, as applied, shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents, for the coatings used for metal parts.

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.1 of these terms and conditions.

The VOC content of the coatings employed shall be determined by USEPA Method 24. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24 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.

V. Testing Requirements (continued)

1.d Emission limitation:
Total OC emissions from R011 thru R015, combined, shall not exceed 18.0 tons per year based upon a rolling, 12-month summation (excluding cleanup).

Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.2 of these terms and conditions.

1.e Emission limitation:
293 lbs of OC/day from the coating of non-metal parts and
210 lbs of OC/day from the coating of metal parts

Applicable Compliance Method:
The daily OC emission limits were established by multiplying the maximum OC content, as applied, of all the coatings (pounds/gallon) by the maximum daily coating usage rate (gallons/day).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
finishing booth - SB5		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant : Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 17.4

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 478.8

MAGLC (ug/m3): 4485.7

VI. Miscellaneous Requirements (continued)

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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