Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Certified Mail

3/14/2011

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

DAVE NADLER
AMERICAN FAN CO.
2933 SYMMES RD
FAIRFIELD, OH 45014

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1409030922
Permit Number: P0107541
Permit Type: Renewal
County: Butler

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Hamilton County Dept. of Environmental Services at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: HCDOES

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

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Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
AMERICAN FAN CO.

Facility ID:	1409030922
Permit Number:	P0107541
Permit Type:	Renewal
Issued:	3/14/2011
Effective:	3/14/2011
Expiration:	3/14/2021

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
AMERICAN FAN CO.

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Authorization

Facility ID: 1409030922
Application Number(s): A0041147
Permit Number: P0107541
Permit Description: PTIO renewal for 3 miscellaneous metal parts spray booths K001, K002 and K003 previously permitted under PTI 14-05383 issued 12/10/02.
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 3/14/2011
Effective Date: 3/14/2011
Expiration Date: 3/14/2021
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

AMERICAN FAN CO.
2933 SYMMES ROAD
Fairfield, OH 45014

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0107541
Permit Description: PTIO renewal for 3 miscellaneous metal parts spray booths K001, K002 and K003 previously permitted under PTI 14-05383 issued 12/10/02.

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

Emissions Unit ID:	**K001**
Company Equipment ID:	Touch-up Paint Spray Booth
Superseded Permit Number:	P0096924
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Original Paint Spray Booth
Superseded Permit Number:	P0096925
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K003**
Company Equipment ID:	Main Paint Spray Booth
Superseded Permit Number:	P0096926
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Hamilton County Dept. of Environmental Services in accordance

with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

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

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

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

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

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

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

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

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. K001, Touch-up Paint Spray Booth

Operations, Property and/or Equipment Description:

Touch-up paint spray booth

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

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

a. d)(3), d)(4).

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The Volatile Organic Compound (VOC) emissions from coatings shall not exceed 84.0 lbs/day. The VOC emissions from coatings shall not exceed 3.77 tons per year (TPY). The VOC emissions from cleanup materials shall not exceed 109.5 lbs/month. The VOC emissions from cleanup materials shall not exceed 0.66 TPY. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-17-11(C).
b.	OAC rule 3745-17-11(C)	See c)(3), c)(4), and d)(5) – d)(9)
c.	OAC rule 3745-21-09(U)(1)(c)	See b)(2)d. below

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of compliance coatings and coating and cleanup material usage limits.

b. The VOC content of all cleanup materials shall not exceed 7.3 pounds per gallon.

c. The daily emission limitation outlined above is based upon the emissions unit's potential to emit (the maximum hourly emission rate multiplied by 24 hours/day). Therefore, no daily records are required to demonstrate compliance with this limit.

d. The VOC content of the coating employed shall not exceed a daily volume-weighted average of 3.5 lbs/gallon, as applied, excluding water and exempt solvents.

c) Operational Restrictions

(1) The maximum cleanup material usage for this emissions unit shall not exceed 15 gallons/month and 180 gallons/year.

(2) The maximum annual coating usage for this emissions unit shall not exceed 2,154 gallons/year, excluding water and exempt solvents.

(3) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(4) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

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

a. The name and identification number of each coating employed.

b. The VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied.

c. The name and identification of each cleanup material employed.

d. The VOC content of each cleanup material, in pounds per gallon.

e. The number of gallons (excluding water and exempt solvents) of each coating employed.

f. The number of gallons of each cleanup material employed.

g. The total VOC emissions from all coatings and cleanup material employed, in pounds or tons [(b x e) + (d x f)].

(2) The permittee shall collect and record the following information on a daily basis for the purpose of determining the daily volume weighted average VOC content for all coatings employed in this emissions unit.

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

b. The VOC content of each coating (excluding water and exempt solvents) in pounds per gallon, as applied.

c. The number of gallons (excluding water and exempt solvents) of each coating employed.

d. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc, 2.

e. The total VOC emissions from all coatings employed in pounds per day (b x c).

(3) The permit to install for this emissions unit K001 was evaluated based on the actual 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. 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: Furfuryl alcohol
TLV (ug/m3): 40,123
Maximum Hourly Emission Rate (lbs/hr): 0.56
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 32.35
MAGLC (ug/m3): 955

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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as

documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

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.).

(4) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 still 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where 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.

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

(6) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer’s recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer’s recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter

while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

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

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

e) Reporting Requirements

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

(2) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily and/or monthly record showing the use of noncomplying coatings or cleanup materials or an exceedance of the monthly cleanup material usage limitations. 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.

f) Testing Requirements

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

a. Emission Limitations:

3.5 pounds VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in term d). In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to 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.

b. Emission Limitation:

84.0 lbs VOC/day and 3.77 tons VOC/year (coatings only)

Applicable Compliance Method:

Compliance with the above emissions limitations shall be determined by using the following equations:

(3.5 lbs VOC/ gallon as daily volume-weighted average) x (1 gallon/ hour) x (24 hours/day) = 84 pounds of VOC per day

(3.5 lbs VOC/ gallon as daily volume-weighted average) x (2154 gallons/year) / (2000 lbs/ ton) = 3.77 tons of VOC per year

c. Emission Limitation:

109.5 lbs VOC/month and 0.66 tons VOC/year (cleanup).

Applicable Compliance Method:

Compliance with the above emissions limitations shall be determined by using the following equations:

(7.3 lbs VOC/ gallon) x (15 gallons/month) = 109.5 pounds of VOC per month

(7.3 lbs VOC/ gallon) x (180 gallons/year) / (2000 lbs/ ton) = 0.66 tons of VOC per year

d. Compliance with the usage limits in term c)(1) and c)(2) shall be demonstrated by the record keeping in term d)(1).

e. Compliance with the VOC content limit in term b)(2)b. shall be demonstrated by the record keeping in term d)(1).

g) Miscellaneous Requirements

(1) None.

2. K002, Original Paint Spray Booth

Operations, Property and/or Equipment Description:

Original - paint spray booth for miscellaneous metal parts

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

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

a. d)(3), d)(4).

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The Volatile Organic Compound (VOC) emissions from coatings shall not exceed 42.0 lbs/day. The VOC emissions from coatings shall not exceed 2.69 tons per year (TPY). The VOC emissions from cleanup material shall not exceed 51.1 lbs/month The VOC emissions from cleanup material shall not exceed 0.29 TPY. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-17-11(C).
b.	OAC rule 3745-17-11(C)	See c)(3), c)(4), and d)(5) – d)(9)
c.	OAC rule 3745-21-09(U)(1)(c)	See b)(2)d. below

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of compliance coatings, coating and cleanup material usage limits.

b. The VOC content of all cleanup materials shall not exceed 7.3 pounds per gallon.

c. The daily emission limitation outlined above is based upon the emissions unit's potential to emit (the maximum hourly emission rate multiplied by 24 hours/day). Therefore, no daily records are required to demonstrate compliance with this limit.

d. The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 lbs/gallon, as applied, excluding water and exempt solvents.

c) Operational Restrictions

(1) The maximum cleanup material usage for this emissions unit shall not exceed 7 gallons per month and 80 gallons per year.

(2) The maximum annual coating usage for this emissions unit shall not exceed 1537 gallons per year, excluding water and exempt solvents.

(3) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(4) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

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

a. The name and identification number of each coating employed.

b. The VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied.

c. The name and identification of each cleanup material employed.

d. The VOC content of each cleanup material, in pounds per gallon.

e. The number of gallons (excluding water and exempt solvents) of each coating employed.

f. The number of gallons of each cleanup material employed.

g. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons [(b x e) + (d x f)].

(2) The permittee shall collect and record the following information on a daily basis for the purpose of determining the daily volume weighted average VOC content for all coatings employed in this emissions unit:

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

b. The VOC content of each coating (excluding water and exempt solvents) in pounds per gallon, as applied.

c. The number of gallons (excluding water and exempt solvents) of each coating employed.

d. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-210-10 for Cvoc,2.

e. The total VOC emissions from all coatings employed in pounds per day (b x c).

(3) The permit to install for this emissions unit K002 was evaluated based on the actual 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. 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: Furfuryl alcohol
TLV (ug/m3): 40,123
Maximum Hourly Emission Rate (lbs/hr): 0.28
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 202.1
MAGLC (ug/m3): 955

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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as

documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

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.).

(4) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 still 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where 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.

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

(6) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer’s recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer’s recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter

while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

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

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

e) Reporting Requirements

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

(2) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily and/or monthly record showing the use of noncomplying coatings or cleanup materials or an exceedance of the monthly cleanup material usage limitation. 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.

f) Testing Requirements

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

a. Emission Limitations:

3.5 pounds VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in term C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to 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.

b. Emission Limitation:

42.0 lbs VOC/day and 2.69 tons VOC/year (coatings only)

Applicable Compliance Method:

Compliance with the above emissions limitations shall be determined by using the following equations:

(3.5 lbs VOC/ gallon as daily volume-weighted average) x (0.5 gallon/ hour) x (24 hours/day) = 42 pounds of VOC per day

(3.5 lbs VOC/ gallon as daily volume-weighted average) x (1537 gallons/year) / (2000 lbs/ ton) = 2.69 tons of VOC per year

c. Emission Limitation:

51.1 lbs VOC/month and 0.29 tons VOC/year (cleanup).

Applicable Compliance Method:

Compliance with the above emissions limitations shall be determined by using the following equations:

(7.3 lbs VOC/ gallon) x (7 gallons/month) = 51.1 pounds of VOC per month

(7.3 lbs VOC/ gallon) x (80 gallons/year) / (2000 lbs/ ton) = 0.29 tons of VOC per year

d. Compliance with the usage limits in term c)(1) and c)(2) shall be demonstrated by the record keeping in term d)(1).

e. Compliance with the VOC content limit in term b)(2)b. shall be demonstrated by the record keeping in term d)(1).

g) Miscellaneous Requirements

(1) None.

3. K003, Main Paint Spray Booth

Operations, Property and/or Equipment Description:

Main - paint spray booth for miscellaneous metal parts

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

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

a. d)(3), d)(4).

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The Volatile Organic Compound (VOC) emissions from coatings shall not exceed 168.0 lbs/day. The VOC emissions from coatings shall not exceed 11.5 tons per year (TPY). The VOC emissions from cleanup material shall not exceed 204.4 lbs/month. The VOC emissions from cleanup material shall not exceed 1.24 TPY. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-17-11(C).
b.	OAC rule 3745-17-11(C)	See c)(3), c)(4), and d)(5) – d)(9)
c.	OAC rule 3745-21-09(U)(1)(c)	See b)(2)d. below.

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of compliance coatings, coating and cleanup material usage limits.

b. The VOC content of all cleanup materials shall not exceed 7.3 pounds per gallon.

c. The daily emission limitation outlined above is based upon the emissions unit's potential to emit (the maximum hourly emission rate multiplied by 24 hours per day). Therefore, no daily records are required to demonstrate compliance with this limit.

d. The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 per gallon, as applied, excluding water and exempt solvents.

c) Operational Restrictions

(1) The maximum cleanup material usage for this emissions unit shall not exceed 28 gallons per month and 340 gallons per year.

(2) The maximum annual coating usage for this emissions unit shall not exceed 6571 gallons per year, excluding water and exempt solvents.

(3) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(4) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

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

a. The name and identification number of each coating employed.

b. The VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied.

c. The name and identification of each cleanup material employed.

d. The VOC content of each cleanup material, in pounds per gallon.

e. The number of gallons (excluding water and exempt solvents) of each coating employed.

f. The number of gallons of each cleanup material employed.

g. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons [(b x e) + (d x f)].

(2) The permittee shall collect and record the following information on a daily basis for the purpose of determining the daily volume weighted average VOC content for all coatings employed in this emissions unit:

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

b. The VOC content of each coating (excluding water and exempt solvents) in pounds per gallon, as applied.

c. The number of gallons (excluding water and exempt solvents) of each coating employed.

d. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-210-10 for Cvoc,2.

e. The total VOC emissions from all coatings employed in pounds per day (b x c).

(3) The permit to install for this emissions unit K003 was evaluated based on the actual 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. 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: Furfuryl alcohol
TLV (ug/m3): 40,123
Maximum Hourly Emission Rate (lbs/hr): 1.11
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 63.36
MAGLC (ug/m3): 955

Pollutant: Toluene
TLV (ug/m3): 75.36
Maximum Hourly Emission Rate (lbs/hr): 2.1
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 23.1
MAGLC (ug/m3): 1794

(4) 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

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 for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 still satisfy the "Air Toxic Policy":

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

e. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

f. where 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.

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

(6) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer’s recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be

based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

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

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

e) Reporting Requirements

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

(2) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily and/or monthly record showing the use of noncomplying coatings or cleanup materials or an exceedance of the monthly cleanup material usage limitation. 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.

f) Testing Requirements

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

a. Emission Limitations:

3.5 pounds VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in term C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to 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.

b. Emission Limitation:

168 lbs VOC/day and 11.5 tons VOC/year (coatings only)

Applicable Compliance Method:

Compliance with the above emissions limitations shall be determined by using the following equations:

(3.5 lbs VOC/ gallon as daily volume-weighted average) x (2 gallons/ hour) x (24 hours/day) = 168 pounds of VOC per day

(3.5 lbs VOC/ gallon as daily volume-weighted average) x (6571 gallons/year) / (2000 lbs/ ton) = 11.5 tons of VOC per year

c. Emission Limitation:

204.4 lbs VOC/month and 1.24 tons VOC/year (cleanup).

Applicable Compliance Method:

Compliance with the above emissions limitations shall be determined by using the following equations:

(7.3 lbs VOC/ gallon) x (28 gallons/month) = 204.4 pounds of VOC per month

(7.3 lbs VOC/ gallon) x (340 gallons/year) / (2000 lbs/ ton) = 1.24 tons of VOC per year

d. Compliance with the usage limits in term c)(1) and c)(2) shall be demonstrated by the record keeping in term d)(1).

e. Compliance with the VOC content limit in term b)(2)b. shall be demonstrated by the record keeping in term d)(1).

g) Miscellaneous Requirements

(1) None.