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

Certified Mail

5/17/2011

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

Phil Raber
Kimble Mixer Co.
1951 Reiser Ave. SE
New Philadelphia, OH 44663

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

Facility ID: 0679020185
Permit Number: P0107797
Permit Type: OAC Chapter 3745-31 Modification
County: Tuscarawas

Dear Permit Holder:

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

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

and

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now.If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5*Via E-Mail Notification*
Ohio EPA-SEDO; Pennsylvania; West Virginia

Permit Strategy Write-Up

1. Check all that apply:

   XSynthetic Minor Determination

   Netting Determination

2. Source Description:

   Kimble Mixer is a mixer truck manufacturing and coating facility located at 1951 Reiser Ave. SE in New Philadelphia, Ohio (Tuscarawas County). The emissions units (EUs) covered by this FEPTIO are EUs R001, R002 and R003, three metal coating booths controlled with particulate filters.

3. Facility Emissions and Attainment Status:

   Tuscarawas County is currently in attainment for all criteria pollutants. The facility-wide synthetic minor restrictions requested by the company and contained in the attached FEPTIO are sufficient for the facility to avoid major new source review (PSD review) as well as Title V for VOC emissions. Emissions limitations for individual and total HAPs have also been re-established or increased to provide the company operational flexibility while ensuring HAP emissions remain below levels at which it would be a major stationary source subject to 40 CFR Part 63, Subpart MMMM even if different coatings are used, as long as the records demonstrate compliance with the HAP limits.

4. Source Emissions:

   This FEPTIO authorizes VOC emissions from each spray booth of up to 76.7 tons per year as BAT. However, total VOC emissions from the facility are being limited to 84.7 tons per rolling, 12-month period. Facility-wide HAP emissions are also limited to 9.9 tons per year for individual HAPs and 24.9 tons per year for total HAPs.

5. Conclusion:

   The operational restrictions, emissions limits, monitoring and record keeping requirements in this permit are sufficient to limit the potential to emit for this unit to below PSD, Title V major source and MACT Subpart MMMM thresholds. Compliance with the facility-wide federally enforceable limits of 84.7 tons of VOC, 9.9 tons of individual HAP, and 24.9 tons of total HAP based on rolling, 12-month summations ensures that these federal rules do not apply.

6. Please provide additional notes or comments as necessary:

   None

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

Pollutant	Tons Per Year
VOC	84.7
Individual HAP	9.9
Total HAP	24.9
Stack PE	0.39
Fugitive PE	7.10

Tuscarawas County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Kimble Mixer Co.

Issue Date: 5/17/2011
Permit Number: P0107797
Permit Type: OAC Chapter 3745-31 Modification
Permit Description: Chapter 31 modification to increase facility-wide HAP limits and first issue operating permits; supercedes PTI #06-08240 issued on 4/10/07
Facility ID: 0679020185
Facility Location: Kimble Mixer Co.
1951 Reiser Ave. SE,
New Philadelphia, OH 44663
Facility Description: Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers

The Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Cara Cherry at Ohio EPA DAPC, Southeast District Office, 2195 Front Street, Logan, OH 43138 or (740)385-8501. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Kimble Mixer Co.

Facility ID:	0679020185
Permit Number:	P0107797
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	5/17/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Kimble Mixer Co.

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Authorization

Facility ID: 0679020185
Application Number(s): A0040193
Permit Number: P0107797
Permit Description: Chapter 31 modification to increase facility-wide HAP limits and first issue operating permits; supercedes PTI #06-08240 issued on 4/10/07
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $600.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 5/17/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Kimble Mixer Co.
1951 Reiser Ave. SE
New Philadelphia, OH 44663

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:

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

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: P0107797
Permit Description: Chapter 31 modification to increase facility-wide HAP limits and first issue operating permits; supercedes PTI #06-08240 issued on 4/10/07

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

Group Name: Paint Booth #s 1-3

Emissions Unit ID:	**R001**
Company Equipment ID:	Paint Booth #1
Superseded Permit Number:	06-08240
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R002**
Company Equipment ID:	Paint Booth #2
Superseded Permit Number:	06-08240
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R003**
Company Equipment ID:	Paint Booth #3
Superseded Permit Number:	06-08240
General Permit Category andType:	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 Ohio EPA DAPC, Southeast District Office 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.

[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).

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

2. The Ohio EPA has determined that this facility may be subject to the requirements of area source MACT/GACT rules that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: http://www.epa.gov/ttn/atw/area/arearules.html.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Paint Booth #s 1-3: R001, R002, R003,

EU ID	Operations, Property and/or Equipment Description
R001	Spray booth number 1
R002	Spray booth number 2
R003	Spray booth number 3

Spray booth #s 1-3 controlled with dry filters; includes 1.5 million BTU/hour gas-fired curing ovens and a combined maximum of 43,800 gallons per year of coating use; Chapter 31 modification and first issue operating permits to increase rolling, 12-month HAP limitations and correct BAT requirements and emissions calculations; supercedes PTI #06-08240 issued on April 10, 2007

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. b)(1)h., b)(2)g., d)(9)-(12), e)(6) and f)(1)g.

(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. b)(1)d., c)(3), d)(8), e)(4), f)(1)d. and f)(1)e.

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.	ORC 3704.03(T)	Volatile organic compound (VOC) emissions from coating use shall not exceed 76.70 tons per rolling, 12-month period.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions (PE) shall not exceed 0.57 pound per hour and 2.50 tons per year. No visible PE from the baghouse stack and no visible emissions of fugitive dust. The requirements of this rule also include compliance with the requirements of OAC

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rules 3745-17-11(C). Best available control measures that are sufficient to eliminate visible emissions of fugitive dust. See b)(2)a.-d. below.
c.	OAC rule 3745-31-05(E), as effective 12/01/06 (Voluntary restriction to avoid BAT requirements)	See b)(2)e. below.
d.	OAC rule 3745-31-05(D) (Synthetic minor restriction to avoid PSD, Title V and 40 CFR Part 63, Subpart MMMM requirements)	VOC emissions from all coatings and cleanup materials used at the facility (emissions units R001, R002, R003 and R004) shall not exceed 84.7 tons based on a rolling, 12-month summation. Emissions of any single hazardous air pollutant (HAP) from the facility shall not exceed 9.9 tons based on a rolling, 12-month summation. Total HAP emissions from the facility shall not exceed 24.9 tons based on a rolling, 12-month summation. See c)(2) below.
e.	OAC rule 3745-21-09(U)(1)(d)	The VOC content of the coatings employed shall not exceed 3.5 lbs per gallon, as applied, excluding water and exempt solvents.
f.	OAC rule 3745-17-11(C)	See c)(1) and (2) below. The requirements of this rule are equivalent to the limitation listed under OAC rule 3745-31-05(A)(3), until such time as U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.
g.	OAC rules 3745-17-07(B) and 3745-17-08(B)	See b)(2)f. below.
h.	ORC 3704.03(F)(4)(c)	See b)(2)g. below.

(2) Additional Terms and Conditions

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

b. The permittee shall employ best available control measures for the above-identified spraying operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permit application, the permittee will maintain the enclosure of the above-mentioned spraying operation, and will ensure that the dry filters capture 97% of the emissions from the spraying operation. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

c. For each spraying operation that is not adequately enclosed, the above-identified control measures shall be implemented if the permittee determines, as a result of the dry filter monitoring and daily VE checks conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the material handling operations until further observation confirms that use of the control measure(s) is unnecessary.

d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

e. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

Permit to Install and Operate P0106809 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. Use of spray equipment with a 65% transfer efficiency;
ii. Controlled with a partial enclosure with a 97% capture efficiency and dry filters with a 99.84% control efficiency (overall control of 96.8%) installed, calibrated, operated, and maintained in accordance with the

manufacturer's recommendations, instructions, and operating manual(s); and

iii. PE shall not exceed 2.50 tons per year.

f. This facility is located in Tuscarawas County, which is not identified in Appendix A of OAC rule 3745-17-08. Therefore, the fugitive dust emissions from this emissions unit are exempt from the fugitive dust control requirements and visible emission limitation established in OAC rules 3745-17-08(B) and 3745-17-07(B), respectively.

g. In order to demonstrate compliance with the Toxic Air Contaminant Statute, the Director has established, per ORC 3704.03(F)(4)(c), a limit for diphenylmethanediisocyante (MDI), which shall not exceed 0.53 pound per day. This daily allowable emissions rate was calculated by multiplying the approved daily operating schedule submitted in the permit application, by the emission rate modeled (to determine the ground level concentration).

c) Operational Restrictions

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

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

(3) The maximum material usage for emissions units R001, R002, R003 and R004, combined, shall not cause VOC emissions to exceed 84.70 tons as a rolling, 12-month summation based on the following equations:

a.

$$X = \sum_{i=1}^{n} (G)(VOC)/2{,}000\text{lbs}$$

where:

X= tons of VOC emissions per month;

G= monthly usage of each coating and cleanup material, in gallons;

VOC= VOC content of each coating and cleanup material, in pounds of VOC per gallon;

n = total number of coatings; and

b.

$$\sum_{i=1}^{n}(X) \text{ is} \leq 84.70 \text{ tons VOC, as a rolling 12-month summation}$$

where:

n = months in the rolling, 12-month period.

The permittee has sufficient monthly records of solvent usage and VOC emissions to begin calculating the rolling, 12-month summations upon final issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) 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.

(2) 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.

(3) 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.

(4) 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.

(5) 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.

(6) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible emissions of fugitive dust from the area immediately above the capture

system serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. the total duration of any visible emissions incident; and

c. any corrective actions taken to eliminate the visible emissions.

(7) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

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

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

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

where:

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

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

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

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

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

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

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

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

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

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

[Note: This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific gallons/year and/or tons/year limitation in a Permit-to-install, where the above-mentioned information shall

be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.]

(8) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units R001, R002, R003 and R004, combined:

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

b. the number of gallons of each coating applied;

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

d. the maximum VOC content of each coating applied, in pounds per gallon;

e. the maximum VOC content of each cleanup material employed, in pounds per gallon;

f. the individual HAP content for each coating and cleanup material, for each HAP, in pounds per gallon;

g. total HAP content for each coating and cleanup material in pounds per gallon;

h. the total VOC emissions from all coatings and cleanup materials employed [the sum of (b. times d.) for all coatings plus (c. times e.) for all cleanup materials] divided by 2,000, in tons;

i. the individual HAP emissions from all coatings and cleanup materials employed [the sum of (b. times f.), for each HAP in all coatings plus (c. times f.) for each HAP in all cleanup materials] divided by 2,000, in tons;

j. the total HAP emissions from all coatings and cleanup materials employed [the sum of (b. times g.) for all coatings plus (c. times g.) for all cleanup materials] divided by 2,000, in tons;

k. the rolling, 12-month summation of the total VOC emissions i.e., the summation of the total VOC emissions, as recorded in h above, for the present month plus the previous 11 months of operation, in ton(s), both on a per booth and combined basis;

l. the rolling, 12-month summation of the individual HAP emissions, i.e., the summation of the individual HAP emissions, as recorded in i above, for the present month plus the previous 11 months of operation, in ton(s); and

m. the rolling, 12-month summation of the total HAP emissions, i.e., the summation of the individual HAP emissions, as recorded in j above, for the present month plus the previous 11 months of operation, in ton(s).

[Note: A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact.

Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.]

(9) The federally enforceable permit-to-install and operate (FEPTIO) application for emissions units R001, R002, R003 and R004 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The Toxic Air Contaminant Statute, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Review of New Sources of Air Toxic Emissions, Option A, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$\text{TLV } (ug/m^3)/10 \times 8/24 \times 5/7 = 4 \text{ TLV}/(24 \text{ X } 7) = \text{MAGLC}$$

d. The following summarizes the results of dispersion modeling for the worst case toxic contaminant:

Toxic Contaminant: MDI (toluene, xylene and methyl methacrylate)

TLV (mg/m3): 0.051 (MDI)

Maximum Hourly Emission Rate (lbs/hr): 0.0221 (MDI)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.027

MAGLC (ug/m3): 1.20

The permittee, having demonstrated that emissions of MDIfrom emissions units R001, R002, R003 and R004, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit(s) at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

(10) Prior to making any physical changes to or changes in the method of operation of the emissions units, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

If the permittee determines that the Toxic Air Contaminant Statute, ORC 3704.03(F), 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 a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(11) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the Toxic Air Contaminant Statute:

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(12) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

(3) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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

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

i. VOC emissions from all coatings and cleanup materials used at the facility (emissions units R001, R002, R003 and R004) shall not exceed 84.7 tons based on a rolling, 12-month summation.

ii. Emissions of any single hazardous air pollutant (HAP) from the facility shall not exceed 9.9 tons based on a rolling, 12-month summation.

iii. Total HAP emissions from the facility shall not exceed 24.9 tons based on a rolling, 12-month summation.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(5) 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.

(6) The permittee shall include in the annual PER any exceedance of the daily limitation on toxic air emissions or any deviation from a restriction on the process or hours of operation, as established by the Director, in order to maintain any toxic air contaminant below its MAGLC. The permittee shall also include in the PER any changes made, during the calendar year, to a parameter or value entered into the dispersion model that was used to maintain compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

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

a. Emissions Limitation:
VOC emissions from coating use shall not exceed 76.70 tons per rolling, 12-month period.

Applicable Compliance Method:
Compliance with the emissions limitation shall be demonstrated by the following one-time calculation based on a maximum coating use rate of five gallons per hour and a maximum VOC content of 3.5 pounds per gallon:

VOC (tons/yr) = 5 gallons per hour X 3.5 pounds per gallon X 8,760 hours per year X 1 ton/2,000 pounds
= 76.70 tons per rolling, 12-month period

b. Emissions Limitations:
PE shall not exceed 0.57 pound per hour and 2.50 tons per year.

Applicable Compliance Method:
Compliance with the emissions limitations shall be demonstrated by the following one-time calculations based on a maximum coating use rate of 5 gallons per hour, a maximum solids content of 10.29 pounds per gallon, a transfer efficiency of 65%, a capture efficiency of 97% and a control efficiency of 99.84%:

PE (lb/hr stack) = gallons per hour coating use X maximum solids content of coating X transfer efficiency X capture efficiency X control efficiency
= 5 gallons/hr X 10.29 pounds/gallon X (1-0.65) X 0.97 X (1-0.9984)
= 0.03 pound per hour

PE (lb/hr fugitive) = gallons per hour coating use X maximum solids content of coating X transfer efficiency X capture efficiency
= 5 gallons/hr X 10.29 pounds/gallon X (1-0.65) X (1-0.97)
= 0.54 pound per hour

Total PE (lb/hr) = 0.03 lb/hr + 0.54 lb/hr
= 0.57 pound per hour

If required, hourly particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", and the procedures specified in OAC rule 3745 17 03(B)(10). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

PE (tons/yr) = 0.57 pound per hour emission factor X 8,760 hours/yr X 1 ton/2,000 pounds
= 2.50 tons per year

c. Emissions Limitation:
No visible PE from the baghouse stack and no visible emissions of fugitive dust.

Applicable Compliance Method:
If required, visible particulate emissions shall be determined according to USEPA Method 22.

d. Emissions Limitation:
VOC emissions from all coatings and cleanup materials used at the facility (emissions units R001, R002, R003 and R004) shall not exceed 84.7 tons based on a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in d)(5)k. of this permit.

e. Emissions Limitations:
Emissions of any single HAP from the facility shall not exceed 9.9 tons based on a rolling, 12-month summation.
Total HAP emissions from the facility shall not exceed 24.9 tons based on a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in d)(5)l. and m. of this permit.

f. Emissions Limitation:
The VOC content of the coatings employed shall not exceed 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in d)(4) of this permit.

g. Emissions Limitation:
MDI emissions shall not exceed 0.53 pound per day.

Applicable Compliance Method:
Compliance shall be based upon the calculation methodology specified in b)(2)g. and the record keeping specified in d)(9)-(12) of this permit.

(2) Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

g) Miscellaneous Requirements

(1) None.