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

Certified Mail

5/23/2011

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

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1483090487
Permit Number: P0108093
Permit Type: Administrative Modification
County: Warren

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)946-7777or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb 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

Ohio | Environmental Protection Agency

# FINAL

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

| | |
|---|---|
| Facility ID: | 1483090487 |
| Permit Number: | P0108093 |
| Permit Type: | Administrative Modification |
| Issued: | 5/23/2011 |
| Effective: | 5/23/2011 |
| Expiration: | 5/8/2014 |

Ohio Environmental Protection Agency

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

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# Authorization

Facility ID: 1483090487
Application Number(s): M0001263
Permit Number: P0108093
Permit Description: This is an agency initiated Administrative Modifcation to Emission units K002 and K006 to correct the permit cycle. The permit should have a 5 year renewal cycle rather than the 10 year renewal cycle.
Permit Type: Administrative Modification
Permit Fee: $0.00
Issue Date: 5/23/2011
Effective Date: 5/23/2011
Expiration Date: 5/8/2014
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

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

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

# Authorization (continued)

Permit Number: P0108093
Permit Description: This is an agency initiated Administrative Modifcation to Emission units K002 and K006 to correct the permit cycle. The permit should have a 5 year renewal cycle rather than the 10 year renewal cycle.

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

| | |
|---|---|
| **Emissions Unit ID:** | **K002** |
| Company Equipment ID: | K002 |
| Superseded Permit Number: | P0103817 |
| General Permit Category and Type: | Not Applicable |
| **Emissions Unit ID:** | **K006** |
| Company Equipment ID: | K006 |
| Superseded Permit Number: | P0103817 |
| 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 takenby 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.

[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) 2., 3., 4., and 5.

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

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

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

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

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

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

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

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

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

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

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

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

      See emission limitations in 2. above;

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

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

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

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

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

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

   a) Emission Limitations:

      The allowable emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions unit K001 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs as specified in 2. above. Compliance with the above limitations shall be determined based upon a rolling, 12-month summation.

      Applicable Compliance Method:

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

6. The Ohio EPA has determined that this facility may be applicable to the requirements of an area source MACT/GACT rule 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. K002**

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

Misc. Metal Parts Spray Painting, Bay A - Non-Compliant Coatings

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)(4), e)(4) and e)(5).

(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)b. and c)(1).

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),<br>As effective 11/30/01 | The VOC emissions from this emissions unit shall not exceed 21.21 pounds per day from all miscellaneous metal parts coating.<br><br>See b)(2)a. |
| b. | OAC rule 3745-31-05(D)<br>Synthetic Minor to avoid Non-Attainment New Source Review, Title V and MACT | The VOC emissions from this emissions unit shall not exceed 5.02 tons per year (TPY), based on a rolling, 12-month summation, from all miscellaneous metal parts coating, pre-coating parts cleaning and cleanup.<br><br>See Section B.2, b)(2)c., b)(2)d. b)2.e. and c)(1). |

| | | |
|---|---|---|
| c. | OAC rule 3745-31-05(A)(3)b.<br>As effective 12/1/06 | The emission limitation established pursuant to this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(D).<br><br>See b)(2)b. |
| d. | OAC rule 3745-21-09(U)(1) | Exempt per OAC rule 3745-21-09(U)(2)(e)(ii) for a miscellaneous metal parts coating line that never uses more than 3 gallons per day. |
| e. | OAC rule 3745-17-11(C) | Exempt per OAC rule 3745-17-11(A)(1)(i). |

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, the rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then the mass NOx, SO2, VOC, PE and PM10, emission limitations no longer apply.

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

Permit to Install and Operate (PTIO) P0108085 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purposes of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. Coating, parts cleaning and cleanup usage limitations

c. The maximum VOC content of coatings shall not exceed 7.07 pounds of VOC per gallon.

d. The maximum VOC content of pre-coating parts cleaning material (Oakite 33) shall not exceed 2.2 pounds of VOC per gallon, excluding water.

e. The maximum VOC content of cleanup materials shall not exceed 7.04 pounds of VOC per gallon.

c) Operational Restrictions

(1) The maximum annual coating usage for this emissions unit shall not exceed 945 gallons, based upon a rolling, 12-month summation of the coating usage figures. The maximum annual pre-coating parts cleaning material (Oakite 33) usage for this emissions unit shall not exceed 365 gallons, excluding water, based upon a rolling, 12-month summation of the material usage figures. The maximum annual cleanup material usage for this emissions unit shall not exceed 365 gallons based upon a rolling, 12-month summation of the cleanup material usage figures.

(2) The permittee shall not employ more than 3 gallons of coating per day for the miscellaneous metal parts and products coating line.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for the coating line:

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

b. the volume, in gallons, of each coating employed;

c. the total volume, in gallons, of all of the coatings employed; and

d. the VOC emissions in pounds per day.

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

a. the coating usage, in gallons, for each month;

b. the pre-coating parts cleaning material usage, in gallons excluding water, for each month;

c. the cleanup material usage, in gallons, for each month;

d. the mass of VOC per volume of each coating (VOC content), excluding water and exempt solvents, as applied, calculated as follows:

$C_{VOC,2}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

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

where:

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

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

$V_S$ is the 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.

e. the VOC content of each coating, in pounds of VOC per gallon, the VOC content of each pre-coating parts cleaning material, in pounds of VOC per gallon, excluding water and the VOC content of each cleanup material, in pounds of VOC per gallon;

f. the rolling, 12-monthsummation of the coating usage figure, in gallons, the rolling, 12-month summation of the pre-coating parts cleaning material figure, in gallons, excluding water, and the rolling, 12-month summation of the cleanup material usage figure, in gallons;

g. the VOC emissions, in tons, as calculated by multiplying the coating usage in a by the coating VOC content in d, plus the pre-coating parts cleaning material usage in b by the pre-coating parts cleaning material VOC content in e, plus the cleanup material usage in c by the cleanup material VOC content in e and dividing the summation by 2000 pounds; and

h. the rolling, 12-monthsummation of the VOC emissions, in tons, from the present month plus the previous 11 months of operation.

(3) The permittee shall maintain daily records of the actual operating hours for this emissions unit.

(4) The permit to install and operate (PTIO) for emissions unit K002 was evaluated based on the actual materials(typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level

concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Stoddard Solvent

TLV (mg/m3): 573

Maximum Hourly Emission Rate (lbs/hr): 18.13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3851

MAGLC* (ug/m3): 327429

Pollutant: xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 12.95

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2750

MAGLC* (ug/m3): 248000

*Where MAGLC = (TLV/10)(8/1)(5/7) adjusted for the duration of the exposure

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying 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.).

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 submit quarterly deviation (excursion) reports for the following emissions unit(s) that identify:

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

b)(1)b. and c)(1)

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).

(3) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit in c)(2). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

(4) The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

(5) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Synthetic Minor Title V Fee Emissions Report.

(6) The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which identify any day in which the actual operations exceeded 16 hours to demonstrate compliance with the air toxics evaluation for xylene, where the MAGLC was adjusted (indicated as the maximum operating hours in PTI Application 14-05965). If no exceedances occurred during the reporting period, the permittee shall state so in the report. These reports shall be submitted by January 31 of each year.

(7) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings, cleanup materials, or pre-coating parts cleaning material. 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) Emission Limitation:

The VOC emissions from this emissions unit shall not exceed 21.21 pounds per day from all miscellaneous metal parts coating.

Applicable Compliance Method:

Compliance with the VOC emission limitation shall be demonstrated by the record keeping requirement in terms d)(1).

(2) Emission Limitation:

The VOC emissions from this emissions unit shall not exceed 5.02 tons per year (TPY), based on a rolling, 12-month summation, from miscellaneous metal parts coating, pre-coating parts cleaning, and cleanup.

Applicable Compliance Method:

Compliance with the VOC emission limitation shall be demonstrated by the record keeping requirement in terms d)(1) and d)(2).

The rolling, 12-month VOC emission limitation was developed from the following equations using the information submitted by the permittee in air PTI number application 14-05965, submitted on July 27, 2007:

945 gallons of coating/year x 7.07 pounds of VOC/gallon x 1 Ton/2000 pounds = 3.34 TPY of VOC.

365 gallons of pre-coating parts cleaning material/year x 2.2 pounds of VOC/gallon x 1 Ton/2000 pounds = 0.40 TPY of VOC.

365 gallons of cleaning material/year x 7.04 pounds of VOC/gallon x 1 Ton/2000 pounds = 1.28 TPY of VOC.

(3) Emission Limitation:

The maximum VOC content of coatings shall not exceed 7.07 pounds of VOC per gallon**.**

Applicable Compliance Method:

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

(4) Emission Limitations:

The maximum VOC content of pre-coating parts cleaning material (Oakite 33) shall not exceed 2.2 pounds of VOC per gallon, excluding water.

The maximum VOC content of cleanup materials shall not exceed 7.04 pounds of VOC per gallon.

Applicable Compliance Method:

Compliance shall be determined by the record keeping in term d)(2).

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

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

g) Miscellaneous Requirements

(1) None.

**2. K006**

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

Misc. Metal Parts Spray Painting, High Bay - Non-Compliant Coatings

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)(4), e)(4) and e)(5).

(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)b. and c)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3), As effective 11/30/01 | The VOC emissions from this emissions unit shall not exceed 21.21 pounds per day from all miscellaneous metal parts coating.<br><br>See b)(2)a. |
| b. | OAC rule 3745-31-05(D) Synthetic Minor to avoid Non-Attainment New Source Review, Title V and MACT | The VOC emissions from this emissions unit shall not exceed 5.02 tons per year (TPY), based on a rolling, 12-month summation, from all miscellaneous metal parts coating, pre-coating parts cleaning and cleanup.<br><br>See Section B.2, b)(2)c., b)(2)d. b)2.e. and c)(1). |

| | | |
|---|---|---|
| c. | OAC rule 3745-31-05(A)(3)b.<br>As effective 12/1/06 | The emission limitation established pursuant to this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(D).<br><br>See b)(2)b. |
| d. | OAC rule 3745-21-09(U)(1) | Exempt per OAC rule 3745-21-09(U)(2)(e)(ii) for a miscellaneous metal parts coating line that never uses more than 3 gallons per day. |
| e. | OAC rule 3745-17-11(C) | Exempt per OAC rule 3745-17-11(A)(1)(i). |

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, the rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then the mass NOx, SO2, VOC, PE and PM10, emission limitations no longer apply.

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

Permit to Install and Operate (PTIO) P0108085 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purposes of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. Coating, parts cleaning and cleanup usage limitations

c. The maximum VOC content of coatings shall not exceed 7.07 pounds of VOC per gallon.

d. The maximum VOC content of pre-coating parts cleaning material (Oakite 33) shall not exceed 2.2 pounds of VOC per gallon, excluding water.

e. The maximum VOC content of cleanup materials shall not exceed 7.04 pounds of VOC per gallon.

c) Operational Restrictions

(1) The maximum annual coating usage for this emissions unit shall not exceed 945 gallons, based upon a rolling, 12-month summation of the coating usage figures. The maximum annual pre-coating parts cleaning material (Oakite 33) usage for this emissions unit shall not exceed 365 gallons, excluding water, based upon a rolling, 12-month summation of the material usage figures. The maximum annual cleanup material usage for this emissions unit shall not exceed 365 gallons based upon a rolling, 12-month summation of the cleanup material usage figures.

(2) The permittee shall not employ more than 3 gallons of coating per day for the miscellaneous metal parts and products coating line.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for the coating line:

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

b. the volume, in gallons, of each coating employed;

c. the total volume, in gallons, of all of the coatings employed; and

d. the VOC emissions in pounds per day.

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

a. the coating usage, in gallons, for each month;

b. the pre-coating parts cleaning material usage, in gallons excluding water, for each month;

c. the cleanup material usage, in gallons, for each month;

d. the mass of VOC per volume of each coating (VOC content), excluding water and exempt solvents, as applied, calculated as follows:

$C_{VOC,2}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

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

where:

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

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

$V_S$ is the 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.

e. the VOC content of each coating, in pounds of VOC per gallon, the VOC content of each pre-coating parts cleaning material, in pounds of VOC per gallon, excluding water and the VOC content of each cleanup material, in pounds of VOC per gallon;

f. the rolling, 12-monthsummation of the coating usage figure, in gallons, the rolling, 12-month summation of the pre-coating parts cleaning material figure, in gallons, excluding water, and the rolling, 12-month summation of the cleanup material usage figure, in gallons;

g. the VOC emissions, in tons, as calculated by multiplying the coating usage in a by the coating VOC content in d, plus the pre-coating parts cleaning material usage in b by the pre-coating parts cleaning material VOC content in e, plus the cleanup material usage in c by the cleanup material VOC content in e and dividing the summation by 2000 pounds; and

h. the rolling, 12-monthsummation of the VOC emissions, in tons, from the present month plus the previous 11 months of operation.

(3) The permittee shall maintain daily records of the actual operating hours for this emissions unit.

(4) The permit to install and operate (PTIO) for emissions unit K002 was evaluated based on the actual materials(typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Stoddard Solvent

TLV (mg/m3): 573

Maximum Hourly Emission Rate (lbs/hr): 18.13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3755

MAGLC* (ug/m3): 327429

Pollutant: xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 12.95

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2681

MAGLC* (ug/m3): 248000

*Where MAGLC = (TLV/10)(8/1)(5/7) adjusted for the duration of the exposure

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying 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.).

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

permitteeshall 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 submit quarterly deviation (excursion) reports for the following emissions unit(s) that identify:

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

b)(1)b. and c)(1)

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).

(3) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit in c)(2). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

(4) The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

(5) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Synthetic Minor Title V Fee Emissions Report.

(6) The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which identify any day in which the actual operations exceeded 16 hours to demonstrate compliance with the air toxics evaluation for xylene, where the MAGLC was adjusted (indicated as the maximum operating hours in PTI Application 14-05965). If no exceedances occurred during the reporting period, the permittee shall state so in the report. These reports shall be submitted by January 31 of each year.

(7) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings, cleanup materials, or pre-coating parts cleaning material. 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) Emission Limitation:

The VOC emissions from this emissions unit shall not exceed 21.21 pounds per day from all miscellaneous metal parts coating.

Applicable Compliance Method:

Compliance with the VOC emission limitation shall be demonstrated by the record keeping requirement in terms d)(1).

(2) Emission Limitation:

The VOC emissions from this emissions unit shall not exceed 5.02 tons per year (TPY), based on a rolling, 12-month summation, from miscellaneous metal parts coating, pre-coating parts cleaning, and cleanup.

Applicable Compliance Method:

Compliance with the VOC emission limitation shall be demonstrated by the record keeping requirement in terms d)(1) and d)(2).

The rolling, 12-month VOC emission limitation was developed from the following equations using the information submitted by the permittee in air PTI number application 14-05965, submitted on July 27, 2007:

945 gallons of coating/year x 7.07 pounds of VOC/gallon x 1 Ton/2000 pounds = 3.34 TPY of VOC.

365 gallons of pre-coating parts cleaning material/year x 2.2 pounds of VOC/gallon x 1 Ton/2000 pounds = 0.40 TPY of VOC.

365 gallons of cleaning material/year x 7.04 pounds of VOC/gallon x 1 Ton/2000 pounds = 1.28 TPY of VOC.

(3) Emission Limitation:

The maximum VOC content of coatings shall not exceed 7.07 pounds of VOC per gallon.

Applicable Compliance Method:

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

(4) Emission Limitations:

The maximum VOC content of pre-coating parts cleaning material (Oakite 33) shall not exceed 2.2 pounds of VOC per gallon, excluding water.

The maximum VOC content of cleanup materials shall not exceed 7.04 pounds of VOC per gallon.

Applicable Compliance Method:

Compliance shall be determined by the record keeping in term d)(2).

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

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

g) Miscellaneous Requirements

(1) None.