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

Certified Mail

6/1/2011

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)

Wendy Myers
Precision Coating Systems, Inc.
948 Columbus Avenue
Marysville, OH 43040

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0180010167
Permit Number: P0107678
Permit Type: Renewal
County: Union

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 Ohio EPA DAPC, Central District Office at (614)728-3778or 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, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-CDO

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

614 | 644 3020
614 | 644 3184 (fax)
www.epa.ohio.gov

Response to Comments

Response to comments for: Permit-To-Install and Operate

Facility ID:	0180010167
Facility Name:	Precision Coating Systems, Inc.
Facility Description:	Precision Coating Systems, Inc. is a paint job shop coating automobile, fiberglass, vinyl, and miscellaneous metal parts.
Facility Address:	948 Columbus Ave Marysville, OH 43040 Union County
Permit #:	P0107678, Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Marysville Tribune on 04/22/2011. The comment period ended on 05/22/2011.	
Hearing date (if held)	NA
Hearing Public Notice Date (if different from draft public notice)	NA

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

No comments were received.

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Precision Coating Systems, Inc.

Facility ID:	0180010167
Permit Number:	P0107678
Permit Type:	Renewal
Issued:	6/1/2011
Effective:	6/1/2011
Expiration:	6/1/2016

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Precision Coating Systems, Inc.

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Authorization

Facility ID: 0180010167
Application Number(s): A0014380
Permit Number: P0107678
Permit Description: Renewal permit for four spray booths (K001-K004) and one paint mixing/gun cleaning room (P001) with federally enforceable limits to avoid Title V for VOCs and HAPs.
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 6/1/2011
Effective Date: 6/1/2011
Expiration Date: 6/1/2016
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Precision Coating Systems, Inc.
948 Columbus Ave
Marysville, OH 43040

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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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: P0107678
Permit Description: Renewal permit for four spray booths (K001-K004) and one paint mixing/gun cleaning room (P001) with federally enforceable limits to avoid Title V for VOCs and HAPs.

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

Group Name: Paint Mixing/Cleaning Room

Emissions Unit ID:	**P001**
Company Equipment ID:	Mixing Room
Superseded Permit Number:	P0104133
General Permit Category andType:	Not Applicable

Group Name: Spray Booths

Emissions Unit ID:	**K001**
Company Equipment ID:	Downdraft Booth #1
Superseded Permit Number:	P0104133
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Downdraft Booth #2
Superseded Permit Number:	P0104133
General Permit Category andType:	Not Applicable

Group Name: Spray Booths w/ Internal Ovens

Emissions Unit ID:	**K003**
Company Equipment ID:	Booth #3
Superseded Permit Number:	P0104133
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K004**
Company Equipment ID:	Booth #4
Superseded Permit Number:	P0104133
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 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 Ohio EPA DAPC, Central 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) The emissions of volatile organic compounds from all emissions units shall not exceed 34.1 tons per year from coating and clean-up material usage based upon a rolling, 12 month summation of the emissions.

      (2) The emissions of hazardous air pollutants from all emissions units shall not exceed 9.9 tons per year from any individual HAP and 24.9 tons per year from all HAPs combined from coating and clean-up materials.

      (3) The maximum annual coating usage shall not exceed 10,000 gallons, based upon a rolling, 12-month summation of the coating usage figures. The maximum annual clean-up materials usage shall not exceed 300 gallons, based upon a rolling, 12-month summation of the clean-up materials figures.

   c) 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 rule are in effect and are enforceable by U.S. EPA. For more information in the area source rules, please refer to the following U.S. EPA website: http://www.epa.gov/fedrgstr/EPA-AIR/2008/January/Day-09/a24718.pdf or http://www.epa.gov/ttn/atw/area/arearules.html.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Paint Mixing/Cleaning Room: P001

EU ID	Operations, Property and/or Equipment Description
P001	Paint mixing and paint gun cleaning room

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)(5) through d)(8)

(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)c., c)(1), d)(4), e)(1), f)(1)c. and f)(1)d.

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 3745-21-07(G)(2)	On any day when employing photochemically reactive materials, organic compound (OC) emissions shall not exceed 8 lb/hr and 40 lb/day See b)(2)a. and d)(1) below.
b.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 4.35 ton/yr See d)(2) and d)(3) below.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V)	The volatile organic compound (VOC) emissions from K001-K004, K006, and P001 shall not exceed 34.1 tons per year from coating and clean-up material usage based upon a rolling, 12-month summation of the emissions. The hazardous air pollutants (HAP) emissions from K001-K004, K006 and

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		P001 shall not exceed 9.9 tons per year from any individual HAP and 24.9 tons per year from all HAPs combined from coating and clean-up materials. See c)(1), d)(4) and e)(1) below.
d.	ORC rule 3704.03(F) (Air Toxics)	See d)(5) through d)(8) below.

(2) Additional Terms and Conditions

a. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)a. and d)(1).

[OAC rule 3745-21-07]

c) Operational Restrictions

(1) The maximum annual coating usage for the emissions units K001-K004, K006 and P001 shall not exceed 10,000 gallons, based upon a rolling, 12-month summation of the coating usage figures. The maximum annual clean-up materials usage for the emissions units K001-K004, K006 and P001 shall not exceed 300 gallons, based upon a rolling, 12-month summation of the clean-up materials figures. The emissions units, K001-K004 and P001, have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating and clean-up materials usage, upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each day for the paint gun cleaning when using photochemically reactive material:

a. The company identification for each photochemically reactive clean-up material employed,

b. The number of gallons of each photochemically reactive clean-up material employed,

c. The organic compound content of each photochemically reactive clean-up material, in pounds per gallon.

d. The total organic compound emission rate for all photochemically reactive clean-up materials, in pounds per day.

e. For each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation.

f. For each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all photochemically reactive clean-up materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

[OAC rule 3745-21-07(G)(2)]

(2) The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions:

a. The name and identification of each coating mixed and clean-up material employed.

b. The number of gallons of each coating mixed and clean-up material employed.

c. The VOC content of each clean-up material, in pounds per gallon.

d. The VOC content of each coating, as mixed, in pounds per gallon.

e. The total VOC emissions from all coatings mixed and clean-up materials employed, in pounds or tons (calculated using an AP-42 emission factor for mixing coatings of 0.1 lb VOC emissions / lb VOC in gallon).

(3) The permittee shall calculate and record the total VOC emissions each year (the annual VOC emissions shall be calculated by summing the VOC emissions from d)(2)e.for the calendar year), in tons, for P001.

(4) The permittee shall collect and record the following information each month for K001-K004, K006 and P001:

a. The name and identification number of each coating employed, thinner, and clean-up material employed.

b. The total volume, in gallons, of each coating, thinner, and clean-up material employed.

c. The VOC, individual HAP, and total HAP content of each coating, thinner, and clean-up material in pounds per gallon.

d. The VOC, individual HAP, and total HAP emissions from all coatings, thinners, and clean-up materials employed, in pounds or tons.

e. The rolling, 12-month summation of the VOC, individual HAP, and total HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

(5) The PTI application for this emissions unit, P001, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit 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 at over one ton per year 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 was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X=24" hours per day and "Y=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):

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more ton/year) or "worst case" toxic contaminant:

Pollutant: Methyl Amyl Ketone
TLV (mg/m3): 235
Maximum Hourly Emission Rate (lb/hr): 36.5
Predicted 1 Hour Maximum Ground Level Concentration at the Fence Line (ug/m3):2,827.0
Maximum Acceptable Ground Level Concentration (MAGLC) (ug/m3): 5,595

The permittee, has demonstrated that emissions of methyl amyl ketone, from emissions unit P001, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); 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).

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

(6) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), 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" 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 PTIO 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

(7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

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 or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

(8) 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

e) Reporting Requirements

(1) 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 and HAP emissions limitations outlined in b)(1)c.

ii. coating and clean-up material usage limitations outlined in 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 (Ohio EPA, Central District Office).

[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.

The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual PER. If no changes to the emissions, emissions unit, or the exhaust stack have been made, then the report shall include a statement to this effect.

[OAC rule 3745-15-03(B)(2)], [OAC rule 3745-15-03(D)], [ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

f) Testing Requirements

(1) Compliance with the applicable emissions limitations in b)(1) shall be determined in accordance with the following methods:

a. <u>Emission Limitations</u>:

Organic compound emissions shall not exceed 8 lb/hr and 40 lb/day on any day when employing photochemically reactive materials.

<u>Applicable Compliance Method</u>:

The record keeping requirements in d)(1) shall be used to determine compliance with the above limitations.

b. Emission Limitation:

4.35 tons VOC/yr including emissions from coating mixing and clean-up material

Applicable Compliance Method:

The record keeping requirements in d)(3) shall be used to determine compliance with the above limitation.

c. Emission Limitations:

The VOC emissions from K001-K004, K006 , and P001 shall not exceed 34.1 tons per year from coating and clean-up material usage based upon a rolling, 12-month summation of the emissions.

Applicable Compliance Method:

The record keeping requirements in d)(4) shall be used to determine compliance with the above limitation.

d. Emission Limitation:

The HAP emissions from K001-K004, K006 and P001 shall not exceed 9.9 tons per year from any individual HAP and 24.9 tons per year from all HAPs combined from coating and clean-up materials.

Applicable Compliance Method:

The record keeping requirements in d)(4) shall be used to determine compliance with the above limitation.

(2) U.S. EPA Method 24 or formulation data shall be used to determine the VOC and OC contents of coatings and clean-up materials.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group -Spray Booths: K001, K002

EU ID	Operations, Property and/or Equipment Description
K001	One of two first stage spray booths (booth #1), coating of misc metal, plastic or fiberglass, with arrestor filters and serviced by a central oven
K002	Second of two first stage spray booths (booth #2), coating of misc metal, plastic or fiberglass, with arrestor filters and serviced by a central oven

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 units terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(12) through d)(15)

(2) For the purpose of a permit-to-operate document, the emissions units 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)e., c)(3), d)(4), e(1), f)(1)f. and f)(1)g.

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 3745-17-11(C)	See c)(1), c)(2) and d)(7) through d)(11) below.
b.	OAC rule 3745-21-07(G)(2)	On any day when employing photochemically reactive materials, organic compound (OC) emissions shall not exceed 8 lb/hr and 40 lb/day See b)(2)a. and d)(1) below.
c.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)b., d)(6) and e)(2) below.
d.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 16.53 tons per year from all coatings & clean-up materials employed in this emissions unit, see d)(2) and d)(3) below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Particulate Emissions (PE) shall not exceed 0.156 ton/yr, see b)(2)c. below. When coating metal parts or on any day when photochemically reactive materials were not employed while coating non-metal parts, volatile organic compound (VOC) emissions shall not exceed 13.22 lb/hr.
e.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V)	The volatile organic compound (VOC) emissions from K001-K004, K006, and P001 shall not exceed 34.1 tons per year from coating and clean-up material usage based upon a rolling, 12-month summation of the emissions. The hazardous air pollutants (HAP) emissions from K001-K004, K006 and P001 shall not exceed 9.9 tons per year from any individual HAP and 24.9 tons per year from all HAPs combined from coating and clean-up materials. See c)(3), d)(4) and e)(1) below.
f.	ORC rule 3704.03(F) (Air Toxics)	See d)(12) through d)(15) below.

(2) Additional Terms and Conditions

a. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)b. and d)(1).

[OAC rule 3745-21-07]

b. For each booth, the permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

c. 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 the ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT for PE 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 the PE limitations no longer apply.

[OAC rule 3745-31-05(A)(3), as effective 11/30/01]

c) Operational Restrictions

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

[OAC rule 3745-17-11(C)(1) and (2)(b)]

(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.

[OAC rule 3745-17-11(C)(2)(e)]

(3) The maximum annual coating usage for the emissions units K001-K004, K006 and P001 shall not exceed 10,000 gallons, based upon a rolling, 12-month summation of the coating usage figures. The maximum annual clean-up materials usage for the emissions units K001-K004, K006 and P001 shall not exceed 300 gallons, based upon a rolling, 12-month summation of the clean-up materials figures. The emissions units, K001-K004 and P001, have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating and clean-up materials usage, upon issuance of this permit.

(4) For each booth, coating usage shall not exceed 417 gallons per month.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each day for the coating operation when using photochemically reactive material:

a. The company identification for each coating and photochemically reactive clean-up material employed.

b. The number of gallons of each coating and photochemically reactive clean-up material employed.

c. The organic compound content of each coating and photochemically reactive clean-up material, in pounds per gallon.

d. For each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive clean-up materials, in pounds per day.

e. For each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation.

f. For each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive clean-up materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

[OAC rule 3745-21-07(G)(2)]

(2) The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions:

a. The name and identification of each coating and clean-up material employed.

b. The number of gallons of each coating and clean-up material employed.

c. The VOC content of each clean-up material, in pounds per gallon.

d. The VOC content of each coating, as applied, in pounds per gallon.

e. The total VOC emissions from all coatings and clean-up materials employed, in pounds or tons.

(3) The permittee shall calculate and record the total VOC emissions each year (the annual VOC emissions shall be calculated by summing the VOC emissions from d)(2)e. for the calendar year), in tons.

(4) The permittee shall collect and record the following information each month for K001-K004, K006 and P001:

a. The name and identification number of each coating employed, thinner, and clean-up material employed.

b. The total volume, in gallons, of each coating, thinner, and clean-up material employed.

c. The VOC, individual HAP, and total HAP content of each coating, thinner, and clean-up material in pounds per gallon.

d. The VOC, individual HAP, and total HAP emissions from all coatings, thinners, and clean-up materials employed, in pounds or tons.

e. The rolling, 12-month summation of the total VOC, individual HAP, and total HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

(5) The permittee shall maintain monthly records of the following information for emissions units K001-K004, K006 , and P001:

a. The coating usage for each month

(6) The permittee shall collect and record the following information each day when coating metal products:

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

b. The number of gallons of each coating employed.

c. The total number of gallons of all the coatings employed.

(7) 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 Ohio EPA, Central District Office upon request.

[OAC 3745-17-11(C)(2)(a)]

(8) 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.

[OAC rule 3745-17-11(C)(2)(c)]

(9) 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.

[OAC rule 3745-17-11(C)(2)(c)]

(10) 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 Ohio EPA, Central District Office upon request.

[OAC rule 3745-17-11(C)(2)(d) and (f)]

(11) 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.

[OAC rule 3745-17-11(C)(2)(e),(f), and (g)], for [OAC rule 3745-17-11(C)(1)]

(12) The PTI application for these emissions units, K001 and K002, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust systems, 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 at over one ton per year 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 units, (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 was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X=24" hours per day and "Y=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):

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more ton/year) or "worst case" toxic contaminant:

Pollutant: Methyl Amyl Ketone
TLV (mg/m3): 235
Maximum Hourly Emission Rate (lb/hr): 36.5
Predicted 1 Hour Maximum Ground Level Concentration at the Fence Line (ug/m3): 2,827.0
Maximum Acceptable Ground Level Concentration (MAGLC) (ug/m3): 5,595

The permittee, has demonstrated that emissions of methyl amyl ketone, from emissions units K001 and K002, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); 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).

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

(13) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), 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" 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 PTIO 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

(14) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

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 or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

(15) 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

e) Reporting Requirements

(1) 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 and HAP emissions limitations outlined in b)(1)e.

ii. coating and clean-up materials usage limitations outlined in c)(3)

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 (Ohio EPA, Central District Office).

[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

(2) The permittee shall notify the director (Ohio EPA, Central District Office) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 10 gallons per day. The notification shall include a copy of such record and shall be sent to the director (Ohio EPA, Central District Office) within 30 days after the exceedance occurs.

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.

The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual PER. If no changes to the emissions, emissions unit, or the exhaust stack have been made, then the report shall include a statement to this effect.

[OAC rule 3745-15-03(B)(2)], [OAC rule 3745-15-03(D)], [ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

f) Testing Requirements

(1) Compliance with the applicable emissions limitations in b)(1) and b)(2) and operational restriction in c)(3) shall be determined in accordance with the following methods:

a. Emission Limitations:

Organic compound emissions shall not exceed 8 lb/hr and 40 lb/day on any day when employing photochemically reactive materials.

Applicable Compliance Method:

The record keeping requirements in d)(1) shall be used to determine compliance with the above limitations.

b. Emission Limitation:

Coating usage shall not exceed 10 gallons per day for the coating of miscellaneous metal parts.

Applicable Compliance Method:

The record keeping requirements in d)(6) shall be used to determine compliance with the above limitation.

c. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 13.22 lb/hr.

Applicable Compliance Method:

The hourly VOC emission limitation was established by multiplying the emissions unit's maximum hourly coating usage rate (2.0 gallons/hr) by the maximum VOC content of all coatings (6.61 pounds of VOC/gallon of coating).

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 16.53 tons per year from all coatings and clean-up materials.

Applicable Compliance Method:

The record keeping requirements in d)(3) of this permit shall be used to determine compliance with the above limitation.

e. Emission Limitation:

Particulate Emissions shall not exceed 0.156 tons per year.

Applicable Compliance Method:

To determine the actual worst case annual particulate emissions rate (E), the following equation shall be used for the paint spraying operations:

E = maximum coating usage x solids content x (1 – TE) x (1 – CE), where:

E = particulate emissions rate (ton/yr)

Maximum coating usage = 5,000 gallons per year

Maximum solids content = 8.31 pounds of solids per gallon

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (62.5%)

CE = control efficiency of the control equipment (assumed to be 98%)

If required, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

f. Emission Limitation:

The VOC emissions from K001-K004, K006 , and P001 shall not exceed 34.1 tons per year from coating and clean-up material usage based upon a rolling, 12-month summation of the emissions.

Applicable Compliance Method:

The record keeping requirements in d)(4) shall be used to determine compliance with the above limitation.

g. Emission Limitation:

The HAP emissions from K001-K004, K006 and P001 shall not exceed 9.9 tons per year from any individual HAP and 24.9 tons per year from all HAPs combined from coating and clean-up materials.

Applicable Compliance Method:

The record keeping requirements in d)(4) shall be used to determine compliance with the above limitation.

h. Emission Limitation:

Coating usage shall not exceed 417 gallons per month.

Applicable Compliance Method:

The record keeping requirements in d)(5) shall be used to determine compliance with the above limitation.

(2) U.S. EPA Method 24 or formulation data shall be used to determine the VOC and OC contents of coatings and clean-up materials.

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -Spray Booths w/ Internal Ovens: K003, K004

EU ID	Operations, Property and/or Equipment Description
K003	Spray booth (booth #3) for the application of a top coat and a clear coat to misc metal, plastic or fiberglass with arrestor filters and serviced by a central oven and an internal oven as a back up
K004	Spray booth (booth #4), coating of misc metal, plastic or fiberglass, with arrestor filters and serviced by an internal oven

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)(12) through d)(15)

(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)e., c)(3), d)(4), e)(1), f)(1)j. and f)(1)k.

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 3745-17-11(C)	See c)(1), c)(2) and d)(7) through d)(11) below.
b.	OAC rule 3745-21-07(G)(2)	On any day when employing photochemically reactive materials, organic compound (OC) emissions shall not exceed 8 lb/hr and 40 lb/day See b)(2)a. and d)(1) below.
c.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)b., d)(6) and e)(2) below.
d.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 16.53 tons per year from all coatings & clean-up materials employed in this emissions unit, see d)(2) and d)(3) below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Particulate Emissions (PE) shall not exceed 0.156 ton/yr, see b)(2)c. below. When coating metal parts or on any day when photochemically reactive materials were not employed while coating non-metal parts, volatile organic compound (VOC) emissions shall not exceed the following: For K003, 26.44 lb VOC/hr For K004, 13.22 lb VOC/hr For K003, emissions from the internal oven shall not exceed 0.023 lb PE/hr, 0.099 ton PE/yr; 0.30 lb nitrogen oxides (NOx)/hr, 1.314 tons NOx/yr; 0.063 lb carbon monoxide (CO)/hr, 0.276 ton CO/yr; 0.002 lb sulfur dioxide (SO_2)/hr, 0.008 SO_2 ton/yr, see b)(2)c. below. For K004, emissions from the internal oven shall not exceed 0.015 lb PE/hr, 0.066 ton PE/yr; 0.20 lbNOx/hr, 0.876 ton NOx/yr; 0.042 lb CO/hr, 0.184 ton CO/yr; 0.001 lb SO_2/hr, 0.005 ton SO_2/yr, see b)(2)c. below.
e.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V)	The volatile organic compound (VOC) emissions from K001-K004, K006, and P001 shall not exceed 34.1 tons per year from coating and clean-up material usage based upon a rolling, 12-month summation of the emissions. The hazardous air pollutants (HAP) emissions from K001-K004, K006 and P001 shall not exceed 9.9 tons per year from any individual HAP and 24.9 tons per year from all HAPs combined from coating and clean-up materials. See c)(3), d)(4) and e)(1) below.
f.	ORC rule 3704.03(F) (Air Toxics)	See d)(12) through d)(15) below.

(2) Additional Terms and Conditions

a. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)b. and d)(1).

[OAC rule 3745-21-07]

b. For each booth, the permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

c. 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 the ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT for PE and emissions from the K003 and K004 internal ovens 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 the PE limitations and emissions limitations from the K003 and K004 internal ovens no longer apply.

[OAC rule 3745-31-05(A)(3), as effective 11/30/01]

c) Operational Restrictions

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

[OAC rule 3745-17-11(C)(1) and (2)(b)]

(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.

[OAC rule 3745-17-11(C)(2)(e)]

(3) The maximum annual coating usage for the emissions units K001-K004, K006 and P001 shall not exceed 10,000 gallons, based upon a rolling, 12-month summation of the coating usage figures. The maximum annual clean-up materials usage for the emissions units K001-K004, K006 and P001 shall not exceed 300 gallons, based upon a rolling, 12-month summation of the clean-up materials figures. The emissions units, K001-K004 and P001, have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating and clean-up materials usage, upon issuance of this permit.

(4) For each booth, coating usage shall not exceed 417 gallons per month.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each day for the coating operation when using photochemically reactive material:

a. The company identification for each coating and photochemically reactive clean-up material employed.

b. The number of gallons of each coating and photochemically reactive clean-up material employed.

c. The organic compound content of each coating and photochemically reactive clean-up material, in pounds per gallon.

d. For each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive clean-up materials, in pounds per day.

e. For each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation.

f. For each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive clean-up materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of “photochemically reactive” and “nonphotochemically reactive” are based upon OAC rule 3745-21-01(C)(5).]

[OAC rule 3745-21-07(G)(2)]

(2) The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions:

a. The name and identification of each coating and clean-up material employed.

b. The number of gallons of each coating and clean-up material employed.

c. The VOC content of each clean-up material, in pounds per gallon.

d. The VOC content of each coating, as applied, in pounds per gallon.

e. The total VOC emissions from all coatings and clean-up materials employed, in pounds or tons.

(3) The permittee shall calculate and record the total VOC emissions each year (the annual VOC emissions shall be calculated by summing the VOC emissions from d)(2)e. for the calendar year), in tons.

(4) The permittee shall collect and record the following information each month for K001-K004, K006 and P001:

a. The name and identification number of each coating employed, thinner, and clean-up material employed.

b. The total volume, in gallons, of each coating, thinner, and clean-up material employed.

c. The VOC, individual HAP, and total HAP content of each coating, thinner, and clean-up material in pounds per gallon.

d. The VOC, individual HAP, and total HAP emissions from all coatings, thinners, and clean-up materials employed, in pounds or tons.

e. The rolling, 12-month summation of the VOC, individual HAP, and total HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

(5) The permittee shall maintain monthly records of the following information for emissions units K001-K004, K006 , and P001:

a. The coating usage for each month.

(6) The permittee shall collect and record the following information each day when coating metal products:

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

b. The number of gallons of each coating employed.

c. The total number of gallons of all the coatings employed.

(7) 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 Ohio EPA, Central District Office upon request.

[OAC 3745-17-11(C)(2)(a)]

(8) 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.

[OAC rule 3745-17-11(C)(2)(c)]

(9) 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.

[OAC rule 3745-17-11(C)(2)(c)]

(10) 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 Ohio EPA, Central District Office upon request.

[OAC rule 3745-17-11(C)(2)(d) and (f)]

(11) 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.

[OAC rule 3745-17-11(C)(2)(e),(f), and (g)], for [OAC rule 3745-17-11(C)(1)]

(12) The PTI application for these emissions units, K003 and K004, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust systems, 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 at over one ton per year 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 units, (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 was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X=24" hours per day and "Y=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):

   $$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more ton/year) or "worst case" toxic contaminant:

   Pollutant: Methyl Amyl Ketone
   TLV (mg/m3): 235
   Maximum Hourly Emission Rate (lb/hr): 36.5
   Predicted 1 Hour Maximum Ground Level Concentration at the Fence Line (ug/m3): 2,827.0
   Maximum Acceptable Ground Level Concentration (MAGLC) (ug/m3): 5,595

The permittee, has demonstrated that emissions of methyl amyl ketone, from emissions units K003 and K004, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); 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).

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

(13) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), 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” 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 PTIO 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

(14) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):

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 or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

(15) 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

e) Reporting Requirements

(1) 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 and HAP emissions limitations outlined in b)(1)e.

ii. coating and clean-up materials usage limitations outlined in c)(3)

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 (Ohio EPA, Central District Office).

[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

(2) The permittee shall notify the director (Ohio EPA, Central District Office) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 10 gallons per day. The notification shall include a copy of such record and shall be sent to the director (Ohio EPA, Central District Office) within 30 days after the exceedance occurs.

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.

The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual PER. If no changes to the emissions, emissions unit, or the exhaust stack have been made, then the report shall include a statement to this effect.

[OAC rule 3745-15-03(B)(2)], [OAC rule 3745-15-03(D)], [ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

f) Testing Requirements

(1) Compliance with the applicable emissions limitations in b)(1) and b)(2) and operational restriction in c)(3) shall be determined in accordance with the following methods:

a. <u>Emission Limitations</u>:

Organic compound emissions shall not exceed 8 lb/hr and 40 lb/day on any day when employing photochemically reactive materials.

<u>Applicable Compliance Method</u>:

The record keeping requirements in d)(1) shall be used to determine compliance with the above limitations.

b. <u>Emission Limitation</u>:

Coating usage shall not exceed 10 gallons per day for the coating of miscellaneous metal parts.

<u>Applicable Compliance Method</u>:

The record keeping requirements in d)(6) shall be used to determine compliance with the above limitation.

c. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 26.44 lb/hr from K003 and 13.22 lb/hr from K004.

Applicable Compliance Method:

The hourly VOC emission limitations were established by multiplying the emissions units' maximum hourly coating usage rate (4.0 gallons/hr for K003; 2.0 gallons/hr for K004) by the maximum VOC content of all coatings (6.61 pounds of VOC/gallon of coating).

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 16.53 tons per year from all coatings and clean-up materials.

Applicable Compliance Method:

The record keeping requirements in d)(3) of this permit shall be used to determine compliance with the above limitation.

e. Emission Limitation:

Particulate Emissions shall not exceed 0.156 tons per year.

Applicable Compliance Method:

To determine the actual worst case annual particulate emissions rate (E), the following equation shall be used for the paint spraying operations:

E = maximum coating usage x solids content x (1 – TE) x (1 – CE), where:

E = particulate emissions rate (ton/yr)

Maximum coating usage = 5,000 gallons per year

Maximum solids content = 8.31 pounds of solids per gallon

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (62.5%)

CE = control efficiency of the control equipment (assumed to be 98%)

If required, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

f. Emission Limitation:

Emissions from the internal oven shall not exceed 0.023 lb PE/hr, 0.099 ton PE/yr for K003 and 0.015 lb PE/hr, 0.066 ton PE/yr for K004.

Applicable Compliance Method:

Compliance with the hourly PE emission limitations shall be determined by multiplying the maximum hourly MMBtu capacity of the emissions unit (3.0 MMBtu/hr for K003; 2.0 MMBtu/hr for K004) by the AP-42 emission factor for natural gas of 0.0075 lb/MMBtu. The annual PE emission limitations are the potentials to emit based on the allowable hourly emission rates multiplied by 8,760 hours/year.

If required, the permittee shall demonstrate compliance with the above hourly PE limitations in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

g. Emission Limitation:

Emissions from the internal oven shall not exceed 0.30 lbNOx/hr, 1.314 ton NOx/yr for K003 and 0.020 lbNOx/hr, 0.876 ton NOx/yr for K004.

Applicable Compliance Method:

Compliance with the hourly NOx emission limitations shall be determined by multiplying the maximum hourly MMBtu capacity of the emissions unit (3.0 MMBtu/hr for K003; 2.0 MMBtu/hr for K004) by the AP-42 emission factor for natural gas of 0.10 lb/MMBtu. The annual NOx emission limitations are the potentials to emit based on the allowable hourly emission rates multiplied by 8,760 hours/year.

If required, the permittee shall demonstrate compliance with the above hourly NOx emission limitations using Method 7 located in 40 CFR Part 60, Appendix A.

h. Emission Limitation:

Emissions from the internal oven shall not exceed 0.063 lb CO/hr, 0.276 ton CO/yr for K003 and 0.42 lb CO/hr, 0.184 ton CO/yr for K004.

Applicable Compliance Method:

Compliance with the hourly CO emission limitations shall be determined by multiplying the maximum hourly MMBtu capacity of the emissions unit (3.0 MMBtu/hr for K003; 2.0 MMBtu/hr for K004) by the AP-42 emission factor for natural gas of 0.021 lb/MMBtu. The annual CO emission limitations are the potentials to emit based on the allowable hourly emission rates multiplied by 8,760 hours/year.

If required, the permittee shall demonstrate compliance with the above hourly CO emission limitations using Method 10 located in 40 CFR Part 60, Appendix A.

i. Emission Limitation:

Emissions from the internal oven shall not exceed 0.002 lb SO_2/hr, 0.008 ton SO_2/yr for K003 and 0.001 lb SO_2/hr, 0.005 ton SO_2/yr for K004.

Applicable Compliance Method:

Compliance with the hourly SO_2 emission limitations shall be determined by multiplying the maximum hourly MMBtu capacity of the emissions unit (3.0 MMBtu/hr for K003; 2.0 MMBtu/hr for K004) by the AP-42 emission factor for natural gas of 0.0006 lb/MMBtu. The annual SO_2 emission limitations are the potentials to emit based on the allowable hourly emission rates multiplied by 8,760 hours/year.

If required, the permittee shall demonstrate compliance with the above hourly SO_2 emission limitations using Method 19 located in 40 CFR Part 60, Appendix A.

j. Emission Limitation:

The VOC emissions from K001-K004, K006 , and P001 shall not exceed 34.1 tons per year from coating and clean-up material usage based upon a rolling, 12-month summation of the emissions.

Applicable Compliance Method:

The record keeping requirements in d)(4) shall be used to determine compliance with the above limitation.

k. Emission Limitation:

The HAP emissions from K001-K004, K006 and P001 shall not exceed 9.9 tons per year from any individual HAP and 24.9 tons per year from all HAPs combined from coating and clean-up materials.

Applicable Compliance Method:

The record keeping requirements in d)(4) shall be used to determine compliance with the above limitation.

l. Emission Limitation:

Coating usage shall not exceed 417 gallons per month.

Applicable Compliance Method:

The record keeping requirements in d)(5) shall be used to determine compliance with the above limitation.

(2) U.S. EPA Method 24 or formulation data shall be used to determine the VOC and OC contents of coatings and clean-up materials.

g) Miscellaneous Requirements

(1) None.