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

Certified Mail

6/6/2011

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)

LINDA TOWNSLEY
OPW FUELING COMPONENTS
9393 PRINCETON-GLENDALE
HAMILTON, OH 45011

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

Facility ID: 1409000070
Permit Number: P0108100
Permit Type: Initial Installation
County: Butler

Dear Permit Holder:

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

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

and

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Hamilton County Dept. of Environmental Services at (513)946-7777.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
HCDOES; Indiana; Kentucky

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

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   Netting Determination

2. Source Description:

   OPW Fueling Components (OPW) is a manufacturer of gasoline-dispensing nozzles and associated equipment located in Butler County, Ohio. OPW's operations include nozzle/component flow test lines to gauge the accuracy, quality, and performance of the manufactured dispensing nozzles and components by re-circulating solvent (medium aliphatic petroleum distillate) from a test tank through each nozzle dispenser and/or component. Regulated emissions from these test lines consist of volatile organic compounds (VOCs) from evaporated solvent during the flow test.

   Under this FEPTIO action, and a separate FEPTIO action P0107946, OPW is requesting to install fifteen new test lines P017 through P031 (FEPTIO P0108100) most of which are currently operated onsite as de minimus (permit exempt) units, increase emissions for existing emissions units P003, P004, P005, P006, P008, P013, P014, P015, and P016 (FEPTIO P0107946), and establish a facility-wide federally enforceable VOC emission limitation of 99.2 tons per year of VOC to ensure the expansion of production and testing operations at OPW does not trigger the requirements under the Title V operating permit statutes.

3. Facility Emissions and Attainment Status:

   OPW is currently a synthetic minor source of VOCs based on a prior Federally Enforceable Permit to Install and Operate (FEPTIO) P0105218, issued 11/12/2009, for emission units P013, P014, P015, and P016, and existing minor source permits for emission units P003, P004, P005, P006, and P008, for a combined facility-wide potential to emit of 60.9 TPY VOC. OPW's actual facility-wide VOC emissions from all existing permitted and de minimus (non-permitted) nozzle/component test lines are 31 TPY of VOC based upon a solvent throughput of 7,569 gallons.

   The facility is located in Butler County which is currently non-attainment for PM2.5, and attainment for all other criteria pollutants. The synthetic minor limitations ensure that the facility is not subject to Title V permitting.

4. Source Emissions:

   Without federally enforceable emission limitations, the potential VOC emissions from all existing and new nozzle and/or component test lines at OPW are 336 TPY of VOC, based on 8,760 hours of operation per year. The federally enforceable VOC emission limitation in this synthetic minor permit action P0108100 for new and previously de minimus (permit exempt) emissions units P017 through P031, and related synthetic minor permit action P0107946 for the existing permitted emissions units will be 99.2 TPY of VOC, as a rolling 12-month summation, for all emissions units combined, including any remaining de minimus or

permit exempt emissions units at the facility. The permittee shall comply with a facility-wide solvent evaporation rate of 24,200 gallons per year, as a 12-month rolling summation, in order to demonstrate compliance with the VOC emission limitation. Since the permittee utilizes one type of solvent in all flow testing operations, the annual solvent evaporation rate was based upon the maximum potential VOC content of the solvent at 8.2 pounds VOC per gallon.

5. Conclusion:

   The permittee has proposed to comply with the facility-wide federally enforceable emission limitation of 99.2 TPY VOC, as rolling 12-month summation; has proposed associated operational and emissions record keeping and reporting to demonstrate compliance with these limitations; and, will accept the terms and conditions of this permit which will limit emissions of VOC as a Synthetic Minor so that the facility will not trigger Title V permitting. The facility will maintain records and be subject to reporting as outlined in the permit to ensure compliance with the synthetic minor emission limitation.

6. Please provide additional notes or comments as necessary:

   None

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

Pollutant	Tons Per Year
VOC	99.2

Butler County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
OPW FUELING COMPONENTS

Issue Date: 6/6/2011
Permit Number: P0108100
Permit Type: Initial Installation
Permit Description: Initial Permitting (including Installations) of GDF Nozzle/Component Test Lines to Establish Facility-Wide Federally Enforceable Limitations
Facility ID: 1409000070
Facility Location: OPW FUELING COMPONENTS
9393 Princeton-Glendale Road,
Hamilton, OH 45011
Facility Description: Measuring and Dispensing Pump Manufacturing

The Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Paul Tedtman at Hamilton County Dept. of Environmental Services, 250 William Howard Taft Pkwy., Cincinnati, OH 45219-2660 or (513)946-7777. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
OPW FUELING COMPONENTS

Facility ID:	1409000070
Permit Number:	P0108100
Permit Type:	Initial Installation
Issued:	6/6/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
OPW FUELING COMPONENTS

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Authorization

Facility ID: 1409000070
Application Number(s): A0041310
Permit Number: P0108100
Permit Description: Initial Permitting (including Installations) of GDF Nozzle/Component Test Lines to Establish Facility-Wide Federally Enforceable Limitations
Permit Type: Initial Installation
Permit Fee: $6,000.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 6/6/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

OPW FUELING COMPONENTS
9393 Princeton-Glendale Road
Hamilton, OH 45011

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0108100
Permit Description: Initial Permitting (including Installations) of GDF Nozzle/Component Test Lines to Establish Facility-Wide Federally Enforceable Limitations

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

Group Name: Test Lines 10 - 24

Emissions Unit ID:	**P017**
Company Equipment ID:	Test Line 10
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P018**
Company Equipment ID:	Test Line 11
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P019**
Company Equipment ID:	Test Line 12
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P020**
Company Equipment ID:	Test Line 13
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P021**
Company Equipment ID:	Test Line 14
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P022**
Company Equipment ID:	Test Line 15
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P023**
Company Equipment ID:	Test Line 16
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P024**
Company Equipment ID:	Test Line 17
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P025**
Company Equipment ID:	Test Line 18
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P026**
Company Equipment ID:	Test Line 19
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P027**
Company Equipment ID:	Test Line 20

Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P028**
Company Equipment ID:	Test Line 21
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P029**
Company Equipment ID:	Test Line 22
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P030**
Company Equipment ID:	Test Line 23
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P031**
Company Equipment ID:	Test Line 24
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Hamilton County Dept. of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) 2., 3., 4., 5., 6., and 7.

2. The actual emissions of volatile organic compounds (VOC) from emissions units P003, P004, P005, P006, P008, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, and P031, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined, shall not exceed 99.2 tons per year (TPY) for VOC, as a rolling, 12-month summation.

   The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

3. The maximum annual amount of solvent evaporated in emissions units P003, P004, P005, P006, P008, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, and P031, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined, shall not exceed 24,200 gallons per year as a rolling 12-month summation. The amount of solvent evaporated shall be determined by taking the number of gallons of solvent employed and subtracting the number of gallons of solvent reclaimed (see record keeping requirements in 4. below.

   The permittee has existing records to demonstrate compliance with this restriction upon permit issuance.

4. The permittee shall collect and record the following information each month for the emissions units identified in 2. and 3. above, including any de minimis, registration status and/or permit exempt emissions unit at the facility, combined:

   a) the company identification of each solvent employed;

   b) the number of gallons of each solvent employed;

   c) the number of gallons of each solvent reclaimed;

   d) the VOC content of each solvent employed, in pounds per gallon;

   e) the total amount of solvent evaporated [summation of (b. – c.) for each solvent], in gallons;

f) the updated rolling, 12-month summation of the total amount of solvent evaporated, in gallons. This shall include the information for the current month and the preceding eleven calendar months;

g) the total VOC emissions [summation of (b. - c.) x d. for each solvent], in pounds; and

h) the updated rolling, 12-month summation of the total VOC emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

5. 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:

(1) allexceedances of the rolling, 12-month limitation on the amount of solvent evaporated as specified in 3. above; and

(2) allexceedances of the rolling, 12-month VOC emission limitation as specified in 2. above.

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

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

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

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

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

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

a) Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 99.2 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation above shall be determined by the record keeping in 4. above.

The annual VOC emission limitation established through OAC rule 3745-31-05(D) was developed from the following equation using the information supplied by the permittee in FEPTIO application A0041310, submitted on April 6, 2011:

24,200 gallons of solvent evaporated per year (facility-wide) x maximum VOC content of 8.2 pounds of VOC/gallon of solvent x 1 ton/2000 pounds = 99.2 TPY of VOC.

US EPA Method 24 or formulation data shall be used to determine the VOC content of the solvents employed.

7. Compliance with the rolling, 12-month solvent evaporation restriction in 3. of these terms and conditions shall be determined by the record keeping in 4. above.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Test Lines 10 - 24: P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031

EU ID	Operations, Property and/or Equipment Description
P017	GDF Nozzle/Component Test Line 10
P018	GDF Nozzle/Component Test Line 11
P019	GDF Nozzle/Component Test Line 12
P020	GDF Nozzle/Component Test Line 13
P021	GDF Nozzle/Component Test Line 14
P022	GDF Nozzle/Component Test Line 15
P023	GDF Nozzle/Component Test Line 16
P024	GDF Nozzle/Component Test Line 17
P025	GDF Nozzle/Component Test Line 18
P026	GDF Nozzle/Component Test Line 19
P027	GDF Nozzle/Component Test Line 20
P028	GDF Nozzle/Component Test Line 21
P029	GDF Nozzle/Component Test Line 22
P030	GDF Nozzle/Component Test Line 23
P031	GDF Nozzle/Component Test Line 24

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. g)(1).

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

a. b)(1)b., d)(1), and e)(2).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC rule 3704.03(T) Best Available Technology (BAT)	Volatile organic compound (VOC) emissions shall not exceed 3.2 pounds per hour.* *The emission limitation outlined above is based upon the emissions unit's potential to emit. Therefore, no hourly record keeping is required to demonstrate compliance with this limitation. See b)(2)a.
b.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V Permitting	See Section B.2 and B.3.

(2) Additional Terms and Conditions

a. The BAT determination pursuant to ORC 3704.03(T) for each emissions unit includes compliance with the VOC emission limitation based on the emissions unit's potential to emit at the maximum capacity.

c) Operational Restrictions

(1) The permittee shall employ only non-hazardous air pollutant (HAP)-containing solvent in each emissions unit.

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

d) Monitoring and/or Recordkeeping Requirements

(1) See Section B.4. of this permit.

(2) The permittee shall collect and maintain records for each solvent employed indicating whether or not the solvent contains HAPs as identified in Section 112(b) of the Clean Air Act.

e) Reporting Requirements

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

(2) See Section B.5. of this permit.

(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.

f) Testing Requirements

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

a. Emission Limitation:

VOC emissions shall not exceed 3.2 pounds per hour.

Applicable Compliance Method:

The hourly emission limitation is based upon the emissions unit's potential to emit and represents the permittee-supplied emission factor derived from engineering estimates and the maximum operating parameters of the test line operations as provided by the permittee in FEPTIO application A0041310, submitted April 6, 2011.

If required, the permittee shall demonstrate compliance with the VOC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and 25 or 25A.

(2) Compliance with the non-HAP solvent restriction in c)(1) shall be determined by the record keeping in d)(2).

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because these emissions units do not employ solvent that contains toxic air contaminants, as defined in OAC rule 3745-114-01. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified federally enforceable permit-to-install and operate (FEPTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the solvent, or use of new solvent, that would cause the emissions of any toxic air contaminant, as defined in OAC rule 3745-114-01, to exceed 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.