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

Certified Mail

6/13/2011

Mr. MIKE CURRENCE
ALL AMERICAN SPORTS CORP
669 SUGAR LANE
Elyria, OH 44035

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)

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0247040955
Permit Number: P0107947
Permit Type: Administrative Modification
County: Lorain

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, Northeast District Office at (330)425-9171or 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-NEDO

Response to Comments

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

Facility ID:	0247040955
Facility Name:	ALL AMERICAN SPORTS CORP
Facility Description:	Sports equipment reconditioning
Facility Address:	ALL-AMERICAN SPORTS CORP 669 SUGAR LANE ELYRIA, OH 44035 Lorain County
Permit #:	P0107947, Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Chronicle Telegram on 05/11/2011. The comment period ended on 06/10/2011.	
Hearing date (if held)	None.
Hearing Public Notice Date (if different from draft public notice)	None.

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.

1. Topic: **None**
    a. Comment: **None**
    b. Response: **None**
2. Topic: **None**
    a. Comment: **None**
    b. Response: **None**

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
ALL AMERICAN SPORTS CORP

Facility ID:	0247040955
Permit Number:	P0107947
Permit Type:	Administrative Modification
Issued:	6/13/2011
Effective:	6/13/2011
Expiration:	5/19/2014

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
ALL AMERICAN SPORTS CORP

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Authorization

Facility ID: 0247040955
Application Number(s): A0041140, A0041535
Permit Number: P0107947
Permit Description: Facility-wide materials usage restriction will be increased to 15,000 gallons/rolling 12-months for plastic coating operations of six booths. There are no other changes to this administrative modification.
Permit Type: Administrative Modification
Permit Fee: $200.00
Issue Date: 6/13/2011
Effective Date: 6/13/2011
Expiration Date: 5/19/2014
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

ALL AMERICAN SPORTS CORP
ALL-AMERICAN SPORTS CORP
669 SUGAR LANE
ELYRIA, OH 44035

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, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

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: P0107947
Permit Description: Facility-wide materials usage restriction will be increased to 15,000 gallons/rolling 12-months for plastic coating operations of six booths. There are no other changes to this administrative modification.

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

Group Name: Booths 6 & 7

Emissions Unit ID:	**R006**
Company Equipment ID:	R006
Superseded Permit Number:	P0104537
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R007**
Company Equipment ID:	R007
Superseded Permit Number:	P0104537
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, Northeast 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) The Ohio EPA has determined that this facility mayin the future be subject to the requirements of aproposed Ohio Administrative Code (OAC) rule 3745-21-26 – Surface Coating of Miscellaneous Metal and Plastics Parts, regarding control of volatile organic compound emissions. Please be advised that all requirements associated with these rules when effective, will be enforceable by Ohio EPA. For more information on these source rules, please refer to the following Ohio EPA website: http://www.epa.ohio.gov/dapc/regs/regs.aspx.

   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) B.2.a) and B.2.b)

2. Federally Enforceable Permit to Install and Operate P0107947 for this air contaminant source takes into account the following voluntary restrictions, regarding the emissions units specified in B.3 and B.4, as proposed by the permittee for the purpose of avoiding New Emission Standards for Hazardous Air Pollutants for the Surface Coating of Plastic Parts and Products requirements under 40 CFR Part 63, Subpart PPPP, and avoiding Title V requirements under OAC rules 3745-77-02 through 3745-77-10:

   a) The emissions of each individual hazardous air pollutant (HAP) from the emissions units, specified in B.3, shall not exceed 9.99 tons/year, based on a rolling 12-month summation, and shall be achieved by employing the operational restrictions, specified in B.4 within this permit for emissions units R001, R002 and R004 through R007.

   b) The emissions of total combined HAPs from the emissions units, specified in B.3, shall not exceed 24.99 tons/year, based on a rolling 12-month summation, and shall be achieved by employing the operational restrictions, specified in B.4 within this permit for emissions units R001, R002 and R004 through R007.

3. Voluntary restrictions to limit potential facility-wide emissions of individual HAPs and total combined HAPs by material usage restrictions concern the following emissions units:

   a) R001 - Coating spray application no. 1 for plastic athletic equipment manufacture with a passive filter to control particulate emissions;

   b) R002 - Coating spray application no. 2 for plastic athletic equipment manufacture with a passive filter to control particulate emissions;

   c) R004 - Coating spray application no. 4 for plastic athletic equipment manufacture with a passive filter to control particulate emissions;

d) R005 - Coating spray application no. 5 for plastic athletic equipment manufacture with a passive filter to control particulate emissions;

e) R006 - Coating spray application no. 6 for plastic athletic equipment manufacture with a passive filter to control particulate emissions; and

f) R007 - Coating spray application no. 7 for plastic athletic equipment manufacture with a passive filter to control particulate emissions.

4. Operational Restrictions

a) The maximum annual materials usage (such as coatings, cleanup materials and thinners) for the coatings spray booth emissions units (R001, R002 and R004 - R007) shall not exceed 15,000 gallons, combined, based upon a rolling, 12-month summation of the materials usage rates.

5. Monitoring and/or Record Keeping Requirements

a) The permittee shall maintain monthly records of the following information for the emissions units identified in B.3.a) through B.3.f):

(1) the rolling, 12-month individual HAP emissions for each HAP, in tons;

(2) the rolling, 12-month total combined HAP emissions, in tons; and

(3) the rolling, 12-month materials usage, in gallons.

6. Reporting Requirements

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

(1) 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:

Emissions Unit ID(s)	Term & Condition
R001, R002 and R004 - R007	B.2.a), B.2.b) and B.4.a)

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

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

(4) 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 Ohio EPA Northeast District Office).

7. Compliance with the allowable emission limitations in B.2 of these terms and conditions shall be determined in accordance with the following method:

a) Emission Limitations:

The emissions of each individual HAP from the emissions units specified in B.3 shall not exceed 9.99 tons/year, based on a rolling, 12-month summation.

The emissions of total combined HAPs from the emissions units specified in B.3 shall not exceed 24.99 tons/year, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the operational restrictions specified in B.4.a) and the record keeping requirements specified in B.5.a).

8. Miscellaneous Requirements

a) None.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Coating spray booth nos. 6 & 7: R006, R007,

EU ID	Operations, Property and/or Equipment Description
R006	Coating spray application no. 6 for plastic athletic equipment manufacture with a passive filter to control particulate emissions
R007	Coating spray application no. 7 for plastic athletic equipment manufacture with a passive filter to control particulate emissions

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

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

a. (d)(4) through (d)(7) and (e)(2)

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)a.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving either emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-11(A)(1)(k)	These emissions units are not subject to the emission limitation requirements of OAC rule 3745-17-11(B)(1) nor the control, inspection and record keeping requirements of OAC rule 3745-17-11(C) because hand held cup spray guns are employed.
d.	OAC rule 3745-31-05(F) – voluntary restriction to avoid BAT	See b)(2)a.

e.	OAC rule 3745-21-07(G)(2)	Each day that a photochemically reactive coating, as defined in OAC rule 3745-21-01(C)(5), is employed, the organic compound (OC) emissions from all coating materials and any photochemically reactive cleanup materials shall not exceed 8 lbs/hr and 40 lbs/day from each emissions unit. See b)(2)b.
f.	OAC rule 3745-31-05(F) – voluntary restriction to avoid BAT	See b)(2)c.
g.	OAC rule 3745-31-05(D)(1)(b) - voluntary restriction to avoid MACT requirements and Title V requirements	See B.2 through B.7.

(2) Additional Terms and Conditions

a. Federally Enforceable Permit to Install and Operate P0107947 for these emissions units, R006 and R007, takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3): a passive, dry particulate dual filter system for each emissions unit with a minimum control efficiency of 99.5%, by weight, for particulate emissions (PE). With the use of a passive, dry particulate dual filter system at each of these emissions units, R006 and R007, the controlled, potential to emit is less than 10 tons of PE per year.

b. 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 requirements of amended OAC rule 3745-21-07 do not apply to emissions units that are installed after February 18, 2008. The following terms and conditions, related to the hourly limitation, shall become void after U.S. EPA approves the rule revision: d)(2)f, d)(2)g, d)(2)h, e)(1)b, e)(1)c, f)(1)b and f)(1)c.

c. After the revised OAC rule 3745-21-07 is added to the Ohio SIP, the OC emissions from all materials employed in these emissions units, R006 and R007, shall not exceed 126 lbs/day and 9.9 tons/year, each.

c) Operational Restrictions

(1) The permittee shall operate and maintain a dry particulate filter system for the surface coating operations associated with each of these emissions units, R006 and R007, in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry

particulate filter(s) shall be employed during all periods of coating application to control particulate emissions.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records that document any time periods when the dry particulate filter system was not in service when these emissions unit(s), R006 and R007, 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.

(2) The permittee shall collect and record the following information for each day for each of these emissions units, R006 and R007:

a. the company identification for each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. an identification of each material as nonphotochemically reactive or photochemically reactive;

d. the OC content of each coating and cleanup material, in lbs/gal;

e. the individual hazardous air pollutant (HAP) content of each coating and cleanup material, in lbs/gal;

f. the OC emissions rate for all coatings and photochemically reactive cleanup materials, in lbs/day;

g. the total number of hours the emissions unit was in operation;

h. the average, hourly OC emissions rate for all coatings and photochemically reactive cleanup materials, i.e., (f)/(g), in pounds per hour (average); and

i. the total OC emissions rate for all coatings and all cleanup materials, in lbs/day.

[Notes: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive materials" is based upon OAC rule 3745-21-01(C)(5).

After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, d)(2)c, d)(2)f, d)(2)g and d)(2)h will be voided entirely.]

(3) The permittee shall collect and record the following information for each month for each of these emissions units, R006 and R007:

a. the total emissions for all coatings and all cleanup materials of each individual HAP, in tons/month;

b. the total emissions for all coatings and all cleanup materials of total combined HAPs, in tons/month; and

c. the total volume of all coatings and all cleanup materials employed, in gal/month.

[Note: A HAP is any air pollutant listed in or pursuant to section 112(b) of the Clean Air Act (42 U.S.C. 7401 et. Seq. and amendments).]

(4) The federally enforceable permit-to-install and operate (FEPTIO) application for FEPTIO# P0104537 for these emissions unit(s), R006 and R007, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The Toxic Air Contaminant Statute, ORC 3704.03(F), was applied to this/these emissions unit(s) 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(s) 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 is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., X hours per day and Y 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 tons/year) or worst case toxic contaminant(s):

Toxic Contaminant: ethyl benzene

Maximum Hourly Emission Rate (lb/hr): 0.40 from R006 & R007 each

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m^3): 113.0 from R006 & R007 combined

MAGLC (µg/m^3): 10,333

TLV (mg/m^3): 434

Toxic Contaminant: xylene

Maximum Hourly Emission Rate (lb/hr): 0.89 from R006 & R007 each

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m^3): 251.2 from R006 & R007 combined

MAGLC (µg/m^3): 10,333

TLV (mg/m^3): 434

The permittee, has demonstrated that emissions of ethyl benzene and xylene, from emissions unit(s) R006 and R007, 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).

(5) 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 FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(6) 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(s) or the materials applied.

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

e) Reporting Requirements

(1) 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 identify in the annual PER the following information during the 12-month reporting period for these emissions units:

a. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

b. each day during which the average hourly OC emissions rate exceeded 8 lbs/hr, and the actual, average hourly OC emissions rate;

c. each day during which the daily OC emissions rate exceeded 40 lbs/day, and the actual OC emissions rate;

d. each day during which the daily OC emissions rate exceeded 126 lbs/day, and the actual OC emissions rate;

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

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

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

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.

[Note: After the revision to OAC rule 3745-21-07 is approved into the Ohio SIP, e)(1)b and e)(1)c shall be voided.]

(2) The permittee shall include any changes made to a parameter or value used in the dispersion model, evaluated for FEPTIO P0107947, 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(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

(1) Compliance with the allowable emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

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

Visible particulate emissions from any stack serving either emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitation:

Each day that a photochemically reactive coating, as defined in OAC rule 3745-21-01(C)(5), is employed, the OC emissions from all coating materials and any photochemically reactive cleanup materials shall not exceed 8 lbs/hr from each emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)h.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, f)(1)b will be voided entirely.]

c. Emission Limitation:

Each day that a photochemically reactive coating, as defined in OAC rule 3745-21-01(C)(5), is employed, the OC emissions from all coating materials and any photochemically reactive cleanup materials shall not exceed 40 lbs/day from each emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)f.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, f)(1)c will be voided entirely.]

d. Emission Limitation:

After the revised OAC rule 3745-21-07 is added to the Ohio SIP, the OC emissions from all materials employed in these emissions units, R006 and R007, shall not exceed 126 lbs/day, each.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)i.

e. Emission Limitation:

After the revised OAC rule 3745-21-07 is added to the Ohio SIP, the OC emissions from all materials employed in these emissions units, R006 and R007, shall not exceed 9.9 tons/year, each.

Applicable Compliance Method:

Compliance shall be demonstrated by the summation of the daily OC emissions, based upon the record keeping requirements specified in d)(2)i, divided by 2000 pounds/ton.

g) Miscellaneous Requirements

(1) None.