



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

7/28/2011

Mr. Rob Imler
JRB ATTACHMENTS LLC
820 GLASER PARKWAY
Akron, OH 44306

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

Facility ID: 1677011077
Permit Number: P0108000
Permit Type: OAC Chapter 3745-31 Modification
County: Summit

Certified Mail

Yes	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)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

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 Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web 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: ARAQMD



Response to Comments

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

Facility ID:	1677011077
Facility Name:	JRB ATTACHMENTS LLC
Facility Description:	
Facility Address:	820 GLASER PARKWAY Akron, OH 44306 Summit County
Permit #:	P0108000, OAC Chapter 3745-31 Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Akron Beacon Journal on 06/24/2011. The comment period ended on 07/24/2011.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

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**

July 21, 2011 - No comments received on the draft terms.



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
JRB ATTACHMENTS LLC**

Facility ID:	1677011077
Permit Number:	P0108000
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	7/28/2011
Effective:	7/28/2011
Expiration:	7/28/2016



Division of Air Pollution Control
Permit-to-Install and Operate
for
JRB ATTACHMENTS LLC

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Authorization

Facility ID: 1677011077
Application Number(s): A0041732
Permit Number: P0108000
Permit Description: Renewal of FEPTIO for a miscellaneous metal parts coating line, including a Chapter 31 modification to allow for a change in the method of operation which will increase production and result in a greater than de minimis increase in annual emissions.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$200.00
Issue Date: 7/28/2011
Effective Date: 7/28/2011
Expiration Date: 7/28/2016
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

JRB ATTACHMENTS LLC
820 GLASER PARKWAY
Akron, OH 44306

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

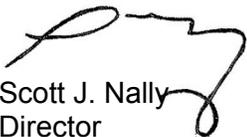
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

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: P0108000
Permit Description: Renewal of FEPTIO for a miscellaneous metal parts coating line, including a Chapter 31 modification to allow for a change in the method of operation which will increase production and result in a greater than de minimis increase in annual emissions.

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

Emissions Unit ID:	K001
Company Equipment ID:	Paint Spray Booth
Superseded Permit Number:	P0103037
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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



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

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is 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 Akron Regional Air Quality Management District 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 submitting¹ 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.

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions



1. K001, Paint Spray Booth

Operations, Property and/or Equipment Description:

Miscellaneous metal parts coating line. Painting of heavy construction equipment scoops and buckets employing air-dried coatings. Maximum coating application rate 1.5 gallons per hour. No VOC emissions control employed. This permit includes a Chapter 31 modification to change the method of operation to allow for an increase in annual production. The original synthetic minor strategy established in Permit to Install (PTI) #16-01693, issued final December 17, 1997, to limit emissions below applicable Title V thresholds, was modified in this permit action to maintain restricted emissions below applicable Title V thresholds with the production increase. Based on the application, this facility is not subject to any GACT/MACT requirements.

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. None.

(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 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.

Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row 1: a. OAC rule 3745-31-05(A)(3) | Volatile organic compound (VOC) emissions shall not exceed 5.25 pounds per hour, as a daily average, from coatings. [The hourly VOC emission limit is based upon a maximum VOC content of 3.5 pounds per gallon of coating and a maximum coating application rate of 1.5 gallons per hour.] The requirements established pursuant to this rule also include the requirements of OAC rule 3745-31-05(D), OAC rule 3745-21-09(U)(1)(d), OAC rule 3745-17-



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		07(A)(1) and OAC rule 3745-17-11(B)(1).
b.	OAC rule 3745-31-05(D) (to avoid Title V requirements)	<p>VOC emissions (from coatings and cleanup materials) from this facility (emissions unit K001) shall not exceed 30 tons per year, as a rolling, 12-month summation of the monthly emission rates.</p> <p>Individual and combined hazardous air pollutant (HAP) emissions (from coatings and cleanup materials) from this facility (emissions unit K001) shall not exceed, respectively, 9.9 tons per year and 24.9 tons per year, as a rolling, 12-month summation of the monthly emission rates.</p> <p>The facility has 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 monthly VOC and HAP emission rates, upon final issuance of this permit.</p> <p>See c)(3) through (5) below.</p>
c.	OAC rule 3745-21-09(U)(1)(d)	No owner or operator of a miscellaneous metal parts or product coating line may cause, allow or permit the discharge into ambient air VOC emissions from such coating line in excess of 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for any coating that is dried at temperatures not exceeding two hundred degrees Fahrenheit.
d.	OAC rule 3745-17-07(A)(1)	<p>Visible particulate emissions (PE) from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.</p> <p>The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to Ohio's State Implementation Plan (SIP) for particulate emissions.</p>
e.	OAC rule 3745-17-07(A)(3)(h)	The visible particulate emission limitation established in paragraph (A)(1) of this rule shall not apply to any air contaminant source which is not subject to any mass



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emission limitation in paragraphs (B)(3) and (B)(4) of rule 3745-17-08 of the Administrative Code, or rule 3745-17-09, 3745-17-10 or 3745-17-11 of the Administrative Code.
f.	OAC rule 3745-17-11(B)(1)	<p>PE from the stack shall not exceed 0.551 pound per hour. (Based upon "Table I" in the appendix to OAC rule 3745-17-11.)</p> <p>See b)(2)a.</p> <p>The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), "Figure II" in the appendix to OAC rule 3745-17-11 shall not apply.</p> <p>The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to Ohio's State Implementation Plan (SIP) for particulate emissions.</p>
g.	OAC rule 3745-17-11(C)	<p>On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated work practices, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio SIP.</p> <p>See b)(2)c and d; d)(6) and (7); and e)(3).</p>

(2) Additional Terms and Conditions

- a. The hourly VOC emissions limit of 5.25 pounds per hour established pursuant to OAC rule 3745-31-05(A)(3) reflects the potential to emit VOC, and the 0.551 pound per hour of PE from OAC rule 3745-17-11(B)(1) is greater than the potential to emit PE for this emissions unit. Therefore, no monitoring, record

keeping, or reporting requirements are necessary to ensure ongoing compliance with these emissions limits.

- b. The permittee shall apply for and, if required, obtain a modification to this permit or obtain a new final permit-to-install and operate (PTIO) prior to making any change to equipment, change in coatings and/or cleanup materials employed, change in the method of operation, or any other change to this emissions unit that results in an increase in the allowable emissions or results in an increase in emissions of greater than the de minimis levels in OAC rule 3745-15-05 of any type of air contaminant not previously emitted.
- c. Any surface coating process not exempt under paragraphs (A)(1)(h) to (A)(1)(l) of OAC rule 3745-17-11 shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices.
- d. Any surface coating process not exempt under paragraphs (A)(1)(h) to (A)(1)(k) of OAC rule 3745-17-11 shall follow all of these work practices for the dry particulate filter:
 - i. The owner or operator shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter with any modifications deemed necessary by the owner or operator during the time period in which the dry particulate filter is utilized.
 - ii. The owner or operator shall operate the dry particulate filter in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator.
 - iii. The owner or operator shall conduct periodic inspections of the dry particulate filter to determine whether the device is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator. The periodic inspections of the dry particulate filter shall be performed at a frequency that is based upon the recommendation of the manufacturer of the dry particulate filter, and the owner or operator shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the owner or operator shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
 - iv. The owner or operator shall document each inspection of the dry particulate filter by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.

- v. In the event that the dry particulate filter is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator, the dry filtration control system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The owner or operator shall maintain documentation of those periods when the dry particulate filter is not operating in accordance with such requirements.
- vi. Any documentation required under paragraphs (C)(2)(d) and (C)(2)(e) of OAC rule 3745-17-11 shall be maintained for not less than five years.
- vii. Any documentation required under paragraphs (C)(2)(a) to (C)(2)(e) of OAC rule 3745-17-11 shall be maintained at the facility and shall be made available to OhioEPA upon request.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for control of particulate emissions whenever this emissions unit is in operation.
- (2) Prior to the use of any coating in this coating line, the permittee shall determine that the coating meets the toxic screening criteria described below.

Purpose: The purpose of this test is to evaluate coatings to determine if the chemical compounds in the coatings would be emitted at acceptable levels for the general permit.

Data Needed: (1) MSDS sheet for each coating to be evaluated. (2) Information on the maximum coating usage rate for the line as discussed in Step 1 below.

Step 1. Using the following factors, calculate the maximum coating usage rate in terms of gallons per hour:

- a. Assume the coating line operates at its maximum speed while still making usable product.
- b. Assume the coating line is operating at its largest coating laydown rate. This would typically be accomplished by assuming the coating line is painting the largest part available.

Step 2. Review the material safety data sheet (MSDS) for the coating. Note each chemical compound listed its TLV and the percent by weight of the chemical compound in the coating.

Step 3. Determine if any of the chemical compounds listed in the MSDS are also listed in the following table. If any of the chemical compounds are listed in the table, then calculate the maximum annual emission of that compound by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. Then multiply the result by 8760 hours per year. The result will be in pounds per year.

Check to see if the calculated emission rate is less than the allowable emission rate found in the below table. If all of the compounds emitted have a maximum annual emissions of less than the allowed rate, then move on to step 4. If any of the compounds are emitted at a rate higher than the allowed emission rate, then contact your appropriate District Office or local air agency contact to determine if you can use the coating.

Chemical Compound	CAS	Molecular Weight(MW)	Allowed Emission Rate (lb/year)
arsenic compounds, as As	7440-38-2	74.92	1.70
benzene	71-43-2	78.11	1100
benzidine	92-87-5	184.23	5.60
benzo(a)pyrene	50-32-8	252.30	6.90
beryllium (and Be compounds)	7440-41-7	9.01	0.350
Cadmium	7440-43-9	112.4	5.20
Chromium	7440-47-3	varies	0.690
Hexachlorobenzine (HCB)	118-74-1	289.78	35.0
mercury (and Hg compounds)	7439-97-6	200.59	0.1
nickel (Ni subsulfide)	12035-72-2	240.19	17.0
Polychlorinated dibenzo-p-dioxins	1746-01-6	varies	0.030
Polychlorinated dibenzofurans	132-64-9	varies	0.030
polychlorinated biphenyls (PCBs, aroclors)	1336-36-3	varies	87.0
vinyl chloride	75-01-4	62.50	2000

Step 4. Find all of the chemical compounds in the coating that have a listed American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Value (TLV). For each chemical compound with a listed TLV (other than those in the above table), calculate the maximum short-term emission rate by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. The result should be in terms of pounds of the chemical compound per hour.

Step 5. Determine if the compound will be emitted at or below the acceptable rate. This is done by searching the following table for the chemical compound's TLV and then determining the maximum allowed emission rate listed in the below table. (Note. If the TLV is listed as ppm, then convert the TLV to $\mu\text{g}/\text{m}^3$ by using the following formula: $(\text{TLV in ppm}) \times (\text{MW}) \times (1000) / 24.45 = \text{TLV in } \mu\text{g}/\text{m}^3$; where MW is the molecular weight of the compound.) This table lists the allowable emission rates for compounds with a TLV between the high range and low range. Compare the maximum calculated short-term emission rate of each chemical compound to the allowed emission rate in the table. If the maximum emission rate is less than the allowed emission rate, then the chemical compound is emitted at an acceptable rate.

TLV Range ($\mu\text{g}/\text{m}^3$)	Allowed Emission Rate (lb/hr)
(The TLV must be less than the high value listed And greater than or equal to the low value listed)	

15	1	0.000067
30	15	0.0010
60	30	0.0020
120	60	0.0040
240	120	0.0080
480	240	0.0160
960	480	0.0320
1,920	960	0.0640
3,840	1,920	0.128
7,680	3,840	0.256
15,360	7,680	0.512
30,720	15,360	1.02
61,440	30,720	2.05
122,880	61,440	4.10
245,760	122,880	8.19
491,520	45,760	16.4
983,040	91,520	32.8
1,966,080	983,040	65.5
3,932,160	1,966,080	131

Step 6. Check each chemical compound that has a listed TLV. If all compounds are emitted at a rate less than the allowed emission rate, then the coating passes the toxic screening test and can be used under this permit. If one or more of the chemical compounds are emitted at a rate greater than the allowed emission rate, then you should contact your appropriate District Office or local air agency contact to determine if you can use the coating.

- (3) The maximum annual VOC material usage* (from the coatings and cleanup materials) for emissions K001 shall not exceed 30 tons, based upon a rolling, 12-month summation of the VOC material usage rates.

*Annual VOC material usage rate (input) is equivalent to an annual VOC emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

- (4) The maximum annual individual HAP material usage** (from the coatings and cleanup materials) for emissions K001 shall not exceed 9.9 tons, based upon a rolling, 12-month summation of the individual HAP material usage rates.

**Annual individual HAP material usage rate (input) is equivalent to an annual individual HAP emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

- (5) The maximum annual combined HAP material usage rate*** (from coatings and clean up materials) for emissions K001 shall not exceed 24.9 tons, based upon a rolling, 12-month summation of the combined HAP material usage rates.

***Annual combined HAP material usage rate (input) is equivalent to an annual combined HAP emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

- (6) The facility has 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 monthly VOC and HAP material usage rates, upon final issuance of this permit
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the results of any toxic screening evaluations done per c)(2).
- (2) The permittee shall collect and record the following information each day for the coating line:
- The name and identification number of each coating employed.
 - The VOC content (excluding water and exempt solvents) of each coating, as applied.
 - The number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - The daily, volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
- Note: If the VOC content of each of the coatings employed during a day is less than 3.5 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.
- (3) The permittee shall collect and record the following information each month for emissions K001 to determine the total VOC material usage and emissions:
- the name and identification number of each coating and cleanup material employed;
 - the weight, in pounds per month, of each coating, as applied;
 - the weight, in pounds per month, of each cleanup material, as applied;
 - the VOC content of each coating, as applied, in percent by weight;
 - the VOC content of each cleanup material, as applied, in percent by weight;
 - the total VOC material usage of all coatings, as applied, in pounds per month, i.e., $f = \sum[b \times d]$ for all coatings;
 - the total VOC material usage of all cleanup materials, as applied, in pounds per month, i.e., $g = \sum[c \times e]$ for all cleanup materials;
 - the total VOC material usage of all coatings and cleanup materials, as applied, in tons per month, i.e., $h = [f + g]/2000$;

- i. the total VOC emissions from all coatings and cleanup materials, as applied, in tons per month, i.e., $i = h$, since emissions rate equals usage rate;
 - j. the rolling, 12-month total VOC material usage rates of all coatings and cleanup materials, as applied, in tons per year; and
 - k. the rolling, 12-month total VOC emissions rates from all coatings and cleanup materials, as applied, in tons per year, i.e., $k = j$, since emissions rate equals usage rate.
- (4) The permittee shall collect and record the following information each month for emissions K001 to determine the individual HAP material usages and emissions:
- a. the name and identification number of each coating and cleanup material employed;
 - b. the weight, in pounds per month, of each coating, as applied;
 - c. the weight, in pounds per month, of each cleanup material, as applied;
 - d. the individual HAP content for each HAP of each coating, as applied, in percent by weight;
 - e. the individual HAP content for each HAP of each cleanup material, as applied, in percent by weight;
 - f. the total individual HAP material usage for each HAP of all coatings, as applied, in pounds per month, i.e., $f = \text{sum}[b \times d]$ for all coatings;
 - g. the total individual HAP material usage for each HAP of all cleanup materials, as applied, in pounds per month, i.e., $g = \text{sum}[c \times e]$ for all cleanup materials;
 - h. the total individual HAP material usage for each HAP of all coatings and cleanup materials, as applied, in tons per month, i.e., $h = [f + g]/2000$;
 - i. the total individual HAP emissions for each HAP from all coatings and cleanup materials, as applied, in tons per month, i.e., $i = h$, since emissions rate equals usage rate;
 - j. the rolling, 12-month individual HAP material usage rates for each HAP of all coatings and cleanup materials, as applied, in tons per year; and
 - k. the rolling, 12-month summation individual HAP emissions rates for each HAP from all coatings and cleanup materials, as applied, in tons per year, i.e., $k = j$, since emissions rate equals usage rate.
- (5) The permittee shall collect and record the following information each month for emissions K001 to determine the combined HAP material usages and emissions:
- a. the name and identification number of each coating and cleanup material employed;

- b. the weight, in pounds per month, of each coating, as applied;
 - c. the weight, in pounds per month, of each cleanup material, as applied;
 - d. the combined HAP content of each coating, as applied, in percent by weight;
 - e. the combined HAP content of each cleanup material, as applied, in percent by weight;
 - f. the total combined HAP material usage of all coatings, as applied, in pounds per month, i.e., $f = \text{sum}[b \times d]$ for all coatings;
 - g. the total combined HAP material usage of all cleanup materials, as applied, in pounds per month, i.e., $g = \text{sum}[c \times e]$ for all cleanup materials;
 - h. the total combined HAP material usage of all coatings and cleanup materials, as applied, in tons per month, i.e., $h = [f + g]/2000$;
 - i. the total combined HAP emissions from all coatings and cleanup materials, as applied, in tons per month, i.e., $i = h$, since emissions rate equals usage rate;
 - j. the rolling, 12-month combined HAP material usage rates of all coatings and cleanup materials, as applied, in tons per year; and
 - k. the rolling, 12-month combined HAP emissions rates from all coatings and cleanup materials, as applied, in tons per year, i.e., $k = j$, since emissions rate equals usage rate.
- (6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was 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.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall 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.
- (3) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing that the dry particulate filter was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the event occurs.
- (4) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing a daily, volume-weighted average VOC content of all the coatings, as applied, greater than 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding two hundred degrees Fahrenheit. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the exceedance occurs.
- (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:
 - i. VOC emissions (from coatings and cleanup materials) from this facility (emissions unit K001) shall not exceed 30 tons per year, as a rolling, 12-month summation of the monthly emission rates;
 - ii. Individual hazardous air pollutant (HAP) emissions (from coatings and cleanup materials) from this facility (emissions unit K001) shall not exceed 9.9 tons per year, as a rolling, 12-month summation of the monthly emission rates; and
 - iii. Combined hazardous air pollutant (HAP) emissions (from coatings and cleanup materials) from this facility (emissions unit K001) shall not exceed 24.9 tons per year, as a rolling, 12-month summation of the monthly emission rates.



- 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).

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions (PE) from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

When requested by the Ohio EPA, compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

b. Emission Limitation:

Stack PE shall not exceed 0.551 pound per hour from coatings

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

$$E = \text{maximum coating solids usage rate, in pounds per hour,} \times (1-TE) \times (1-CE)$$

Where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55);

and

CE = fractional control efficiency of the control equipment (0.99).

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

c. Emissions Limitation:

No owner or operator of amiscellaneous metal parts or product coating line may cause, allow or permitthe discharge into ambient air VOC emissions from such coating line in excess of 3.5 pounds of VOC per gallon of coating, excluding water and exemptsolvents, for any coating that is dried at temperatures notexceeding two hundred degrees Fahrenheit.

Applicable Compliance Method:

Compliance shall based upon the record keeping specified in d)(3) of the terms and conditions of this permit.

d. Emissions Limitation:

VOC emissions (from coatings and cleanup materials) from this facility (emissions unit K001) shall not exceed 30 tons per year, as a rolling, 12-month summation of the monthly emission rates.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(4) of the terms and conditions of this permit.

e. Emissions Limitation:

Individual and combined hazardous air pollutant (HAP) emissions (from coatings and cleanup materials) from this facility (emissions unit K001) shall not exceed, respectively, 9.9 tons per year and 24.9 tons per year, as a rolling, 12-month summation of the monthly emission rates.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(5) and d)(6) of the terms and conditions of this permit.

- (2) In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall

use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

g) Miscellaneous Requirements

- (1) None.