



Environmental
Protection Agency

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

Certified Mail

8/17/2011

M.S. BEVERSTOCK
WARWICK PRODUCTS
5350 TRADEX PKWY
CLEVELAND, OH 44102-5887

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)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

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

Facility ID: 1318005003
Permit Number: P0108147
Permit Type: Initial Installation
County: Cuyahoga

Dear Permit Holder:

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

Andrew Hall Permit Review/Development Section Ohio EPA, DAPC 122 South Front Street Columbus, Ohio 43215	and	Cleveland Division of Air Quality 2nd Floor 75 Erieview Plaza Cleveland, OH 44114
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Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
CDAQ; Pennsylvania; Canada



Permit Strategy Write-Up

1. Check all that apply:

[x] Synthetic Minor Determination

Netting Determination

2. Source Description:

The facility consists of two paint booths. They are described as the Old Booth (K001) and the New Booth (K002). They are located side by side. They each have three sides, a roof, and dry filtration systems which are 99% efficient. The same coatings are used in each booth. Material is applied at 1 gal/hr. Painting is not done every day. The maximum amount of paint applied in one day is 5 gal/day at a rate of 1 gal/hour. The facility is typically open 5 days a week and 52 week/year operating for 5 hours/day and 1300 hours/year. We have included a 1,600 hour per rolling 12-month summation annual operating limit to allow some flexibility in their operation.

3. Facility Emissions and Attainment Status:

The allowable emissions for VOC from K001 and K002 is 10.90 TPY. The synthetic minor determination was made to limit the hours of operation based on a rolling 12-month summation. This will limit VOC and keep their highest single HAP below 10 tons per year and facility wide HAPs below 25 TPY.

Cuyahoga County is currently in non-attainment for PM 2.5.

4. Source Emissions:

Each spray booth, K001 and K002 has the potential to emit 28.78 TPY of VOC and 0.19 TPY from clean up material. The potential to emit for the highest single HAP, Xylene, is 5.30, with both combined being over 10 TPY for a single HAP. The allowable emissions for VOC of 5.45 Tons per rolling 12-month summation for coating and cleanup combined will limit the HAP Xylene to 0.97 TPY for each emission unit.

5. Conclusion:

Record keeping requirements of coating usage will ensure Warwick Products stays below the limits in their permit.

6. Please provide additional notes or comments as necessary:

None

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

Table with 2 columns: Emission Unit, VOC and VOC from Cleanup. Rows include EU, K001, K002, and Total.

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
WARWICK PRODUCTS

Issue Date: 8/17/2011
Permit Number: P0108147
Permit Type: Initial Installation
Permit Description: This is an initial FEPTIO, P0108147, for two paint spray booths that have been operating without an air permit. Each both is equipped with dry filtration systems for particulate.
Facility ID: 1318005003
Facility Location: WARWICK PRODUCTS
7909 OLD ROCKSIDE RD.,
Cleveland, OH 44131
Facility Description: Sign Manufacturing

The Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to David Hearne at Cleveland Division of Air Quality, 2nd Floor 75 Erieview Plaza, Cleveland, OH 44114 or (216)664-2297. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Ohio

**Environmental
Protection Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
WARWICK PRODUCTS**

Facility ID:	1318005003
Permit Number:	P0108147
Permit Type:	Initial Installation
Issued:	8/17/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
WARWICK PRODUCTS

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Authorization

Facility ID: 1318005003
Application Number(s): A0041913
Permit Number: P0108147
Permit Description: This is an initial FEPTIO, P0108147, for two paint spray booths that have been operating without an air permit. Each both is equipped with dry filtration systems for particulate.
Permit Type: Initial Installation
Permit Fee: \$400.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 8/17/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

WARWICK PRODUCTS
7909 OLD ROCKSIDE RD.
Cleveland, OH 44131

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:

Cleveland Division of Air Quality
2nd Floor
75 Erievue Plaza
Cleveland, OH 44114
(216)664-2297

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: P0108147

Permit Description: This is an initial FEPTIO, P0108147, for two paint spray booths that have been operating without an air permit. Each booth is equipped with dry filtration systems for particulate.

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:	Old Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	New Booth
Superseded Permit Number:	
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 Cleveland Division of Air Quality 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, Old Booth

Operations, Property and/or Equipment Description:

Paint spray booth

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. b)(1)b., b)(2)a., d)(1), e)(3)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions from the coatings shall not exceed 6.57 lbs/hr.</p> <p>Volatile organic compound (VOC) emissions from the cleanup material shall not exceed 6.39 lbs/hr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(C) and OAC rule 3745-21-09(U)(2).</p>
b.	OAC rule 3745-31-05(D)	<p>Volatile organic compound (VOC) emissions from coating and cleanup material shall not exceed 5.45 tons per year from coating based upon a rolling, 12-month summation of the emissions.</p> <p>See b)(2)a.</p>



Table with 3 columns: Rule/Requirement, Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-17-07(A), OAC rule 3745-17-11(C), and OAC rule 3745-21-09(U)(2)(e)(ii).

(2) Additional Terms and Conditions

- a. The maximum annual operating hours for this emissions unit shall not exceed 1,600 hours...
b. The permittee shall not employ more than three gallons of coating per day for the miscellaneous metal parts and products coating line.

c) Operational Restrictions

- (1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation...

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
a. the operating hours for each month; and
b. the rolling, 12-month summation of the operating hours.
(2) For each day miscellaneous metal parts and products are coated the permittee shall collect and record the following information for the coating line.
a. the name and identification number of each coating employed;
b. the volume, in gallons, of each coating employed; and
c. the total volume, in gallons, of all of the coatings employed.
(3) The permittee shall collect and record the following information each month for this emissions unit:
a. the name and identification number of each coating employed; and
b. the VOC content, in lbs of VOC per gallon (excluding water and exempt solvents), of each coating, as applied; and

- c. the number of gallons (excluding water and exempt solvents) of each coating, as applied;
 - d. the monthly VOC emissions from all coatings employed, in pounds, [i.e., the sum of d)(3)b. times d)(3)c. for each coating employed];
 - e. the total number of hours this emissions unit was in operation;
 - f. the average hourly VOC emissions from all coatings employed, in pounds [i.e., the quotient of d)(3)d. divided by d)(2)e.];
 - g. the name of each cleanup material;
 - h. the VOC content of each cleanup material;
 - i. the number of gallons of each cleanup material; and
 - j. the monthly VOC emissions from all cleanup material [i.e., the sum of d)(3)(h. times d)(3)i. for each cleanup material employed].
- (4) The permittee shall maintain annual records of the VOC emissions from this emission unit for both coatings and cleanup material determined by summing the monthly emissions from d)(3)d. and d)(3)j. above.
- (5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Cleveland Division of Air Quality (CDAQ).
- (6) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturers' recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturers recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and

- d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the CDAQ upon request.

- (9) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturers 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 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. all exceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit;
 - 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).

- (4) The permittee shall notify the CDAQ of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be submitted, electronically through Ohio EPA Air Services within 45 days after the exceedance occurs.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emission from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

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:

Volatile organic compound (VOC) emissions from the coatings shall not exceed 6.57 lbs/hr.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in d)(3).

c. Emission Limitation:

Volatile organic compound (VOC) emissions from the cleanup material shall not exceed 6.39 lbs/hr.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in d)(3).

d. Emission Limitation:

Volatile organic compound (VOC) emissions from the coatings and cleanup material shall not exceed 5.45 tons/year.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in d)(3) and d)(4).

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to



install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.



2. K002, New Booth

Operations, Property and/or Equipment Description:

Paint Spray Booth

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. b)(1)c., b)(2)d., d)(1), e)(3)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) as effective 11/30/2001	<p>Volatile organic compound (VOC) emissions from the coatings shall not exceed 6.57 lbs/hr.</p> <p>Volatile organic compound (VOC) emissions from the cleanup material shall not exceed 6.39 lbs/hr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(C) and OAC rule 3745-21-09(U)(2).</p> <p>See b)(2)a. below.</p>
b.	OAC rule 3745-31-05(A)(3)(b) as effective 12/01/06	See b)(2)b. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(D)	<p>Volatile organic compound (VOC) emissions from the coatings and cleanup material shall not exceed 5.45 tons per year from coating based upon a rolling, 12-month summation of the emissions.</p> <p>See b)(2)d. below.</p>
d.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a six-minute average except as provided by rule.
e.	OAC rule 3745-17-11(C)	See c)(1) and d)(5) through d)(9).
f.	OAC rule 3745-21-09(U)(2)(e)(ii)	See b)(2)c.

(2) Additional Terms and Conditions

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

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the calculated annual emission rate for VOC is less than 10 tons/year, taking into account the federally enforceable rule limit of 1,600 hours of operation per rolling 12-month summation under OAC rule 3745-31-05(D).

c. The permittee shall not employ more than three gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.

d. The maximum annual operating hours for this emissions unit shall not exceed 1,600 hours, based upon a rolling, 12-month summation of the operating hours.

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the operating hours for each month; and
 - b. the rolling, 12-month summation of the operating hours.
- (2) For each day miscellaneous metal parts and products are coated the permittee shall collect and record the following information for the coating line.
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all of the coatings employed.
- (3) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating employed; and
 - b. the VOC content, in lbs of VOC per gallon (excluding water and exempt solvents), of each coating, as applied; and
 - c. the number of gallons (excluding water and exempt solvents) of each coating, as applied;
 - d. the monthly VOC emissions from all coatings employed, in pounds, [i.e., the sum of d)(3)b. times d)(3)c. for each coating employed];
 - e. the total number of hours this emissions unit was in operation;
 - f. the average hourly VOC emissions from all coatings employed, in pounds [i.e., the quotient of d)(3)d. divided by d)(2)e.];
 - g. the name of each cleanup material;
 - h. the VOC content of each cleanup material;
 - i. the number of gallons of each cleanup material; and
 - j. the monthly VOC emissions from all cleanup material [i.e., the sum of d)(3)(h. times d)(3)i. for each cleanup material employed].

- (4) The permittee shall maintain annual records of the VOC emissions from this emission unit for both coatings and cleanup material determined by summing the monthly emissions from d(3)d. and d(3)j. above.
- (5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Cleveland Division of Air Quality (CDAQ) upon request.
- (6) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturers' recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturers recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the CDAQ upon request.

- (9) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturers 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 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. all exceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit;
 - 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).

- (4) The permittee shall notify the CDAQ in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the CDAQ within 45 days after the exceedance occurs.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:
Visible particulate emission from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
- Applicable Compliance Method:
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:

Volatile organic compound (VOC) emissions from the coatings shall not exceed 6.57 lbs/hr.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in d)(3).

c. Emission Limitation:

Volatile organic compound (VOC) emissions from the cleanup material shall not exceed 6.39 lbs/hr.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in d)(3).

d. Emission Limitation:

Volatile organic compound (VOC) emissions from the coatings and cleanup material shall not exceed 5.45 tons/year.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in d)(3) and d)(4).

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.