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

9/15/2011

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Pat Fleming
Howden North America Inc.
338 SOUTH BROADWAY
NEW PHILADELPHIA, OH 44663

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0679020075
Permit Number: P0107439
Permit Type: Initial Installation
County: Tuscarawas

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it 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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Southeast District Office. 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.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA
Ohio EPA-SEDO; Pennsylvania; West Virginia

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Howden North America Inc.

Facility ID:	0679020075
Permit Number:	P0107439
Permit Type:	Initial Installation
Issued:	9/15/2011
Effective:	9/15/2011

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Howden North America Inc.

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Authorization

Facility ID: 0679020075
Facility Description:
Application Number(s): A0040946
Permit Number: P0107439
Permit Description: Initial installation permit for the east and west small paint booths
Permit Type: Initial Installation
Permit Fee: $800.00
Issue Date: 9/15/2011
Effective Date: 9/15/2011

This document constitutes issuance to:

Howden North America Inc.
338 South Broadway
New Philadelphia, OH 44663

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

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

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0107439
Permit Description: Initial installation permit for the east and west small paint booths

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

Group Name: Small paint booths

Emissions Unit ID:	**R005**
Company Equipment ID:	Small Paint Booth West
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R006**
Company Equipment ID:	Small Paint Booth East
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

d) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have

been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southeast District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as “permanently shut down” in Ohio EPA’s “Air Services” 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).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the “Owner/Contact Change” functionality in Air Services once the transfer is legally completed.The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. Emissions units R005 and R006 contained in this permit are subject to 40 CFR Part 63, Subpart MMMM. The complete MACT requirements, including the MACT General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulation (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Small Paint Booths: R005, R006

EU ID	Operations, Property and/or Equipment Description
R005	Small Paint Booth West
R006	Small Paint Booth East

Col-Met Model # 104-1412-14-02-01 side downdraft paint booths controlled with dry particulate filters with a 90% control efficiency and used to coat miscellaneous metal parts with conventional spray guns and a shared 2.5 million BTU/hour natural gas fired flash/drying oven; maximum coatings usage rate of 3,650 gallons per year per booth and facility-wide maximum cleanup solvent usage rate of 150 gallons per year

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) g)(1)

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)	Volatile organic compound (VOC) emissions from coating operations shall not exceed 31.85 pounds per hour and 11.63 tons per year.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD major source status for VOC)	VOC emissions from coating and cleanup operations in emissions units R004, R005 and R006, combined, shall not exceed 35.40 tons per rolling, 12-month period. See c)(3) below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(iii).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions (PE) shall not exceed 2.12 pounds per hour and 0.77 ton per year. There shall be no visible PE from the stacks serving this emissions unit. See b)(2)a. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(C).
c.	OAC rule 3745-31-05(E), as effective 12/01/06 (Voluntary restriction to avoid BAT requirements for PE)	See b)(2)b. below.
d.	OAC rule 3745-17-11(C)	See c)(1) and (2) below.
e.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)c. below.
f.	40 CFR Part 63, Subpart MMMM (40 CFR 63.3880–3981) [In accordance with 40 CFR 63.3881(a) and (b), this emissions unit is an existing miscellaneous metal parts or products surface coating source that uses 250 gallons or more per year of coatings that contain HAPs at a major source of HAP emissions and is subject to the emissions limitations and control measures specified in this section.]	Organic hazardous air pollutant (HAP) emissions from metal parts coating operations in this emissions unit shall not exceed: 0.31 kg/liter or 2.6 lbs/gallon of coating solids used during each rolling, 12-month period when general use coatings are used. [40 CFR 63.3890(b)(1)] 3.3 kg/liter or 27.5 lbs/gallon of coating solids used during each rolling, 12-month period when high performance coatings are used. [40 CFR 63.3890(b)(2)] 1.5 kg/liter or 12.4 lbs/gallon of coating solids used during each rolling, 12-month period when extreme performance fluoropolymer coatings are used. [40 CFR 63.3890(b)(5)] See b)(2)d. and e. below.
g.	40 CFR 63.1-16 (40 CFR 63.3901)	Table 2 to Subpart MMMM of Part 63 – Applicability of General Provisions to Subpart MMMM of Part 63 shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265

changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision 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, then these emission limits/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 SIP.

Permit to Install P0107439 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. maximum coating use rate of 3,650 gallons per year;
ii. use of spray equipment with a 60% transfer efficiency;
iii. controlled with a partial enclosure with a 100% capture efficiency and dry filters with a 90% control efficiency (overall control of 90%) installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s); and
iv. PE shall not exceed 0.77 ton per year.

c. The permittee shall not employ more than ten 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 permittee shall be subject to the requirements and limitations of 40 CFR Part 63, Subpart MMMM, upon the date of initial startup of the affected source.

e. For any coating operation that is meeting the emission limitations in 40 CFR 63.3890 by using the "without add-on control" option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis following the initial compliance period, i.e., the mass average organic HAP emission rate shall be calculated each month as required in 40 CFR 63.3951 and 63.3952.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system with a control efficiency of at least 90% for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

(3) The VOC content of coatings shall not exceed 6.37 pounds per gallon of coating, as applied, excluding water and exempt solvents.

d) Monitoring and/or Recordkeeping Requirements

(1) 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 appropriate Ohio EPA District Office or local air agency upon request.

(2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(3) 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.

(4) 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 appropriate Ohio EPA District Office or local air agency upon request.

(5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(6) The permittee shall collect and record the following information each day for this emissions unit:

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

b. The number of gallons of each coating employed.

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

(7) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units R004, R005 and R006, combined:

a. the number of gallons of each coating and cleanup material employed during the month;

b. the maximum VOC content of each coating and cleanup material employed, in pounds per gallon;

c. the total VOC emissions from all coatings and cleanup materials employed [the sum of (a. times b.) for all coatings plus (a. times b.) for all cleanup materials] divided by 2,000, in tons; and

d. the rolling, 12-month summation of the total VOC emissions i.e., the summation of the total VOC emissions, as recorded in c. above, for the present month plus the previous 11 months of operation, in ton(s).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

(8) The permittee, having chosen to demonstrate compliance with the coating content limitation in c)(3) through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

a. the name and identification number of each coating, as applied; and

b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$

where:

D_C = the density of coating, in pounds of coating per gallon of coating.

$W_{VOC} = W_{VM} - W_W - W_{ES}$

V_S = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$V_{VOC} = V_{VM} - V_W - V_{ES}$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific "gallons/year" and/or "tons/year" limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

(9) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart RRR, including the following sections:

63.3930(a)	Maintain copies of each notification and report submitted
63.3930(b)	Maintain information provided by material suppliers or manufacturers and copies of any coating test data.
63.3930(c)(3)	Maintain calculations of the total mass of organic HAP emissions for the coatings, thinners and/or other additives and cleaning materials used each month, the mass organic HAP in waste materials (if applicable), the total volume of coatings solids used each month and each 12-month organic HAP emission rate for each compliance period.
63.3930(d)	Maintain records of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period.

63.3930(e)	Maintain records of the mass fraction of organic HAP for each coating, thinner and/or other additive and cleaning material used during each compliance period.
63.3930(f)	Maintain records of the volume fraction of coating solids for each coating used during each compliance period
63.3930(g)	Maintain records of the density of each coating, thinner and/or other additive and cleaning material used during each compliance period.
63.3930(h)	Maintain records of the organic HAP content of waste materials disposed.
63.3930(j)	Maintain records of date, time and duration of each deviation.
63.3950	Conduct initial compliance demonstration.
63.3951	Demonstrate initial compliance with emissions limitation.
63.3952	Demonstrate continuous compliance with emissions limitation.

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 quarterly deviation (excursion) reports that identify the following:

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

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(3) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

(4) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

(5) The permittee shall submit notifications and reports to the appropriate Ohio EPA District office as required pursuant to 40 CFR Part 63, Subpart RRR, per the following sections:

63.3910(b)	Initial notification
63.3910(c), 63.3950 and 63.9(h)	Notification of compliance status
63.3920(a)	Semi-annual excess emissions/summary reports

f) Testing Requirements

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

a. Emissions Limitations:
VOC emissions from coating operations shall not exceed 31.85 pounds per hour and 11.63 tons per year.

Applicable Compliance Method:
Compliance with the emissions limitations shall be demonstrated by the following one-time calculations based on a maximum coating use rate of five gallons per hour and 3,650 gallons per year and a maximum coating VOC content of 6.37 pounds per gallon.

VOC (lbs/hr) = 5 gal/hour X 6.37 pounds VOC/gal
= 31.85 pounds per hour

VOC (tons/yr) = 3,650 gal/yr X 6.37 pounds VOC/gal X 1 ton/2,000 pounds
= 11.63 tons per year

If required, organic compound emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

b. Emissions Limitation:
VOC emissions from coating and cleanup operations in emissions units R004, R005 and R006, combined, shall not exceed 35.40 tons per rolling, 12-month period.

Applicable Compliance Method:
Compliance shall be based upon a summation of VOC emissions from emissions units R004, R005 and R006 determined in accordance with the record keeping specified in d)(7)d. of this permit.

c. Emissions Limitation:
The permittee shall not employ more than ten gallons of coating per day for the miscellaneous metal parts and products coating line.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in d)(6)c. of this permit.

d. Emissions Limitation:
The VOC content of coatings shall not exceed 6.37 pounds per gallon of coating, as applied, excluding water and exempt solvents.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in d)(8) of this permit.

e. Emissions Limitations:
PE shall not exceed 2.12 pounds per hour and 0.77 ton per year.

Applicable Compliance Method:
Compliance with the emissions limitations shall be demonstrated by the following one-time calculations based on a maximum coating use rates of five gallons per hour and 3,650 gallons per year, a maximum solids content of 10.59 pounds per gallon, a transfer efficiency of 60%, a capture efficiency of 100% and a control efficiency of 90%:

PE (lbs/hr) = gallons per hour coating use X maximum solids content of coating X transfer efficiency X capture efficiency X control efficiency
= 5 gallons/hr X 10.59 pounds solids/gal X (1-0.60) X 100% X (1-0.90)
= 2.12 pounds per hour

If required, hourly particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", and the procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

PE (tons/yr) = gallons per year coating use X maximum solids content of coating X transfer efficiency X capture efficiency X control efficiency X 1 ton/2,000 pounds
= 3,650 gallons/yr X 10.59 pounds solids/gal X (1-0.60) X 100% X (1-0.90) X 1 ton/2,000 lbs
= 0.77 tons per year

f. Emissions Limitation:
There shall be no visible PE from the stacks serving this emissions unit.

Applicable Compliance Method:
If required, visible particulate emissions shall be determined according to USEPA Method 22.

g. Emissions Limitation:
Organic hazardous air pollutant (HAP) emissions from metal parts coating operations in this emissions unit shall not exceed: 0.31 kg/liter or 2.6 lbs/gallon of coating solids used during each rolling, 12-month period when general use coatings are used, 3.3 kgs/liter or 27.5 lbs/gallon of coating solids used during each rolling, 12-month period when high performance coatings are used and 1.5 kgs/liter or 12.4 lbs/gallon of coating solids used during each rolling, 12-month period when extreme performance fluoropolymer coatings are used.

Applicable Compliance Method:
Compliance with the emissions limitations shall be demonstrated by the recordkeeping specified in d)(9) of this permit and as allowed in 40 CFR 63.3890(c) for operations where more than one of the subcategory emissions limits apply.

(2) Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

g) Miscellaneous Requirements

(1) Modeling for organic toxic air contaminants was not required pursuant to Engineering Guide #70, Question 3 because organic HAP emissions from this emissions unit are subject to 40 CFR Part 63, Subpart MMMM. Modeling to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary for inorganic toxic air contaminants because the emissions unit’s maximum annual emissions for each inorganic toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees 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 changes in the composition of the materials, or use of new materials, that would cause the emissions of any inorganic toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit-to-install.