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

Certified Mail

9/21/2011

Mr. Troy Hellwig
Cascade Corp
2501 Sheridan Ave
Springfield, OH 45505

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	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: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0812100207
Permit Number: P0107115
Permit Type: Renewal
County: Clark

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page,www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: RAPCA

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Cascade Corp

Facility ID:	0812100207
Permit Number:	P0107115
Permit Type:	Renewal
Issued:	9/21/2011
Effective:	9/21/2011
Expiration:	9/21/2016

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Cascade Corp

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Authorization

Facility ID: 0812100207
Application Number(s): A0040295
Permit Number: P0107115
Permit Description: FEPTIO renewal for five miscellaneous metal parts coating lines.
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 9/21/2011
Effective Date: 9/21/2011
Expiration Date: 9/21/2016
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Cascade Corp
2501 Sheridan Ave
Springfield, OH 45505

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:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

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: P0107115
Permit Description: FEPTIO renewal for five miscellaneous metal parts coating lines.

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

Group Name: 21-09(U)(1)(c) units

Emissions Unit ID:	**K003**
Company Equipment ID:	Manual Spray Booth K003
Superseded Permit Number:	08-04766
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K005**
Company Equipment ID:	Hydraulic Cylinder Paint System
Superseded Permit Number:	08-04397
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K007**
Company Equipment ID:	Manual Spray Booth K007
Superseded Permit Number:	08-04766
General Permit Category andType:	Not Applicable

Group Name: 21-09(U)(2)(e) units

Emissions Unit ID:	**K002**
Company Equipment ID:	Binks Paint Spray Booth #3
Superseded Permit Number:	08-04397
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K006**
Company Equipment ID:	Binks Spray Paint Booth
Superseded Permit Number:	08-04397
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

2. The emissions of hazardous air pollutants (HAPs), as defined in Section 112(b) of Title III of the Clean Air Act, from all the emissions units at this facility, shall not exceed 9.9 TPY for any individual HAP, as a rolling, 12-month sum, and 24.9 TPY for any combination of HAPs, as a rolling 12-month sum.

3. The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP) applied in the emissions unit:

   a) The identification of each coating, thinner, additive, cleanup material, and any other material containing any HAP;

   b) the identification of each individual HAP contained in each material employed (and identified in a) above) and the pound(s) of each HAP per gallon of material;

   c) the volume, in gallons, of each coating, thinner, additive, cleanup material, and other material employed during the month;

   d) for each individual HAP, the total emissions from all the materials employed, in ton(s), (i.e., for each individual HAP, the sum of the products of b) times c) for all the materials employed during the month, divided by 2,000 pounds);

   e) the total combined HAPs emissions from all the materials employed during the month, in ton(s), (i.e., the sum of all the individual HAPs emissions from d) above);

   f) the rolling 12-month individual HAP emissions rates (i.e., the sum of the individual HAP emissions, as recorded in d), for the previous 12 months, in tons); and

   g) the rolling 12-month combined HAPs emissions rates (i.e., the sum of the combined HAPs emissions, as recorded in e), for the previous 12 months, in tons).

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

4. The permittee shall submit quarterly deviation (excursion) reports, in accordance with Part I of the Standard Terms and Conditions, of this permit, of the following information:

a) An identification of each month during which the rolling, 12-month individual HAP emissions rate (from the facility) exceeded 9.9 tons, and the actual rolling, 12-month sum of each individual HAP emissions rate (from the facility) for each such month.

b) An identification of each month during which the rolling, 12-month combination of all HAP emissions rates (from the facility) exceeded 24.9 tons, and the actual rolling, 12-month sum of the combination of all HAP emissions rates (from the facility) for each such month.

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, 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). 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.

5. The permittee shall submit annual reports that summarize the annual emissions of each individual HAP and the combined emissions of all the HAPs for the facility. 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 Synthetic Minor Title V Fee Emission Report.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group – Compliant Coating Paint Lines: K003, K005, K007,

EU ID	Operations, Property and/or Equipment Description
K003	Large Clamp Paint Booth, Manual Spray Booth with infrared drying oven
K005	Hydraulic Cylinder Paint System
K007	Single Double/Carton Clamp Paint Booth, Manual Spray with Infrared Drying Oven

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

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

a. d)(3) through d)(5).

(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) 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)	Emissions Unit K003 and K007: The volatile organic compound (VOC) emissions from each emissions unit shall not exceed 210 pounds per day excluding clean up. Emissions Unit K005: The VOC emissions from this emissions unit shall not exceed 336 pounds per day excluding cleanup. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and 3745-21-09(U)(1)(c) See b)(2)a.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V and MACT)	Emissions Units K003 and K007: The VOC emissions from each emissions unit shall not exceed 11.2 tons VOC on a rolling 12-month basis. Emissions Unit K005: The VOC emissions from this emissions unit shall not exceed 10.5 tons VOC on a rolling 12-month basis. The individual hazardous air pollutant (HAP) emissions from emissions units K002, K003, K005, K006, and K007 shall not exceed 9.9 TPY and combined HAP emissions shall not exceed 24.9 TPY on a rolling 12-month basis. See Section B.2. through B.5.
c.	OAC rule 3745-21-09(U)(1)(e)	The VOC content of the coatings applied in this emissions unit shall not exceed 3.5 pounds VOC per gallon excluding water and exempt solvents.
d.	OAC rule 3745-114	See d)(3) through d)(5).

(2) Additional Terms and Conditions

a. The daily VOC emissions limits were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for each coating line and shall maintain this information at the facility:

a. the identification 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.

(2) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in each emissions unit:

a. the volume, in gallons, of each coating applied;

b. the maximum VOC content (excluding water and exempt solvents) of each coating applied;

c. the total VOC emissions from all coatings applied, i.e., the summation of the products of “i.e.,(2)a. times (2)b for each coating applied during the month;

d. the name and identification of each cleanup material employed;

e. the VOC content of each cleanup material, in pounds per gallon;

f. the number of gallons of each cleanup material employed;

g. the total VOC emission rate from all cleanup materials, in pounds or tons, (i.e., the summation of the products of (2)e times (2)f for all cleanup materials employed); and

h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, (i.e., the sum of (2)c and (2)g).

i. the rolling 12-month VOC emissions rate for each emissions unit (i.e., the sum of the VOC emissions, as recorded in (2)h. for the previous 12 months, in tons).

(3) The permit to install for this emissions units K003 and K007 was evaluated based on the actual materials (typically coatings) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: N-butyl acetate
TLV (mg/m^3): 713
Maximum Hourly Emission Rate (lbs/hr): 11.0
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m^3): 1378
MAGLC (µg/m^3): 16,968

Pollutant:Methyl Ethyl Ketone
TLV (mg/m^3): 590
Maximum Hourly Emission Rate (lbs/hr): 1.63
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 205
MAGLC (µg/m3): 14,042

Pollutant: Xylene
TLV (mg/m^3): 434
Maximum Hourly Emission Rate (lbs/hr): 1.26
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m^3): 159
MAGLC (µg/m^3): 10,338

Pollutant: Methyl Amyl Ketone
TLV (mg/m^3): 233
Maximum Hourly Emission Rate (lbs/hr): 1.0
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m^3): 126
MAGLC (µg/m^3): 5,560

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that

the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

(4) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

(5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the rolling 12-month VOC emissions limitation for each 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).

(2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. 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 30 days following the end of the calendar month.

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(4) The permittee shall submit annual reports that summarize the annual emissions of VOC for the facility. 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 Synthetic Minor Title V Fee Emission Report.

f) Testing Requirements

(1) Compliance with the emissions limitation(s) in b)(1) shall be determined in accordance with the following methods:

a. Emissions limitation –

<u>Emissions Unit K003 and K007</u>: The VOC emissions from each emissions unit shall not exceed 210 pounds per day excluding clean up.

Applicable Compliance Method –

This emissions limitation is based upon the maximum application rate of 60 gallons per day the maximum VOC content of the coating applied (3.5 lbs of VOC/gallon, excluding water and exempt solvents).

b. Emissions limitation –

<u>Emissions Unit K005</u>: The VOC emissions from this emissions unit shall not exceed 336 pounds per day excluding clean up.

Applicable Compliance Method –

This emissions limitation is based upon the maximum application rate of 96 gallons per day the maximum VOC content of the coating applied (3.5 lbs of VOC/gallon, excluding water and exempt solvents).

c. Emissions limitation –

Emissions Unit K003 and K007: The VOC emissions from each emissions unit shall not exceed 11.2 tons VOC on a rolling 12-month basis.

Applicable Compliance Method –

Compliance shall be based on the record keeping requirements of d)(1) and d)(2).

d. Emissions limitation –

Emissions Unit K005: The VOC emissions from this emissions unit shall not exceed 10.5 tons VOC on a rolling 12-month basis.

Applicable Compliance Method –

Compliance shall be based on the record keeping requirements of d)(1) and d)(2).

e. Emissions limitation –

The VOC content of the coatings applied in this emissions unit shall not exceed 3.5 pounds VOC per gallon excluding water and exempt solvents.

Applicable Compliance Method –

Compliance shall be based on the record keeping requirements of d)(1).

If requested, the VOC content of the coating applied in these emissions units shall be determined according to U.S. EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group -21-09(U)(2)(e) units: K002, K006,

EU ID	Operations, Property and/or Equipment Description
K002	(Binks Paint Spray Booth #3) Manual Paint Spray Booth
K006	Binks Spray Paint Booth, Misc. Metal Parts

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<u>Emissions Unit K002</u>: The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 47.0 pounds per day excluding clean up and 9.02 tons per year including clean up. <u>Emissions Unit K006:</u> The VOC emissions from this emissions unit shall not exceed 45.8 pounds per day excluding clean up and 8.82 tons per year including clean up. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-21-09(U)(2)(e)

b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V and MACT)	The individual hazardous air pollutant (HAP) emissions from emissions units K002, K003, K005, K006, and K007 shall not exceed 9.9 TPY and combined HAP emissions shall not exceed 24.9 TPY on a rolling 12-month basis. See Section B.2. through B.5.
c.	OAC rules 3745-21-09(U)(2)(e)	The permittee shall not employ more than eight gallons of coating per day for each of the miscellaneous metal parts and products coating line.

(2) Additional Terms and Conditions

a. The daily and annual VOC emissions limits were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these emissions limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for the coating line.

a. the identification 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.

(2) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in these emissions units:

a. the number of gallons of each coating applied or all coatings applied during the month;

b. the VOC content of each coating applied, in pounds per gallon;

c. the total VOC emissions from all coatings applied (i.e., the sum of the products of 2)a. times 2)b. for each coating applied);

d. the name and identification of each cleanup material employed;

e. the VOC content of each cleanup material, in pounds per gallon;

f. the volume, in gallons, of each cleanup material employed;

g. the total VOC emission rate from all cleanup materials, i.e., the sum of the products of 2)e. times 2)f. for all cleanup materials employed; and

h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, (i.e., the sum of 2)c. and 2)g.).

These monthly records shall be maintained for the purpose of determining annual VOC emissions for the emissions unit.

e) Reporting Requirements

(1) 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.

(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 annual reports that summarize the annual emissions of VOC for the facility. 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 Synthetic Minor Title V Fee Emission Report.

f) Testing Requirements

(1) Compliance with the emissions limitation(s) in b)(1) shall be determined in accordance with the following methods:

a. Emissions limitation –

<u>Emissions Unit K002</u>: The VOC emissions from each emissions unit shall not exceed 47.0 pounds per day excluding clean up.

Applicable Compliance Method –

This emissions limitation is based upon the maximum application rate of 8 gallons per day the maximum VOC content of the coating applied (5.87 lbs of VOC/gallon).

b. Emissions limitation –

<u>Emissions Unit K006</u>: The VOC emissions from this emissions unit shall not exceed 45.8 pounds per day excluding clean up.

Applicable Compliance Method –

This emissions limitation is based upon the maximum application rate of 8 gallons per day the maximum VOC content of the coating applied (5.73 lbs of VOC/gallon).

c. Emissions limitation –

Emissions Unit K002: The VOC emissions from each emissions unit shall not exceed 9.02 tons per year including clean up.

Applicable Compliance Method –

This emissions limitation is based upon the maximum daily VOC emissions rate from coating application (47.0 pounds per day and 365 days per year) and clean up (7.5 pounds VOC and 120 gallons per year).

d. Emissions limitation –

Emissions Unit K006: The VOC emissions from each emissions unit shall not exceed 8.82 tons per year including clean up.

Applicable Compliance Method –

This emissions limitation is based upon the maximum daily VOC emissions rate from coating application (45.8 pounds per day and 365 days per year) and clean up (7.5 pounds VOC and 120 gallons per year).

g) Miscellaneous Requirements

(1) None.