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

Certified Mail

11/1/2011

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
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Mr. John Dues
AKZO NOBEL COATINGS, INC.
1550 PROGRESS DR
Springfield, OH 45505

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0812100438
Permit Number: P0108940
Permit Type: Administrative Modification
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
AKZO NOBEL COATINGS, INC.

Facility ID:	0812100438
Permit Number:	P0108940
Permit Type:	Administrative Modification
Issued:	11/1/2011
Effective:	11/1/2011
Expiration:	12/13/2020

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
AKZO NOBEL COATINGS, INC.

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Authorization

Facility ID: 0812100438
Application Number(s): M0001423
Permit Number: P0108940
Permit Description: For emissions unit L002, permit term e)(1) on page 14 requires submittal of quarterly reports. This report has ben removed as this information should actually be included in the annual PER term e)(2) only. Thus, only an annual report will be required.
Permit Type: Administrative Modification
Permit Fee: $0.00
Issue Date: 11/1/2011
Effective Date: 11/1/2011
Expiration Date: 12/13/2020
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

AKZO NOBEL COATINGS, INC.
1550 PROGRESS DR
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: P0108940
Permit Description: For emissions unit L002, permit term e)(1) on page 14 requires submittal of quarterly reports. This report has ben removed as this information should actually be included in the annual PER term e)(2) only. Thus, only an annual report will be required.

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

Emissions Unit ID:	**L002**
Company Equipment ID:	Pressure pot heads cold cleaner
Superseded Permit Number:	P0107049
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P001**
Company Equipment ID:	Paint Blending Equipment
Superseded Permit Number:	P0107049
General Permit Category and Type:	Not Applicable

Group Name: Paint Spray Booths: K001, K002

Emissions Unit ID:	**K001**
Company Equipment ID:	Paint Spray Booth #1
Superseded Permit Number:	P0107049
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Paint Spray Booth #2
Superseded Permit Number:	P0107049
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. Facility wide volatile organic compound (VOC) emissions from cleanup materials shall not exceed 11.3 tons per rolling, 12-month period.

3. The permittee shall collect and record the following information for each month for the facility:

   a) The company identification of each cleanup material employed.

   b) The number of gallons of each cleanup material employed.

   c) The VOC content of each cleanup material employed, in pounds per gallon.

   d) The total VOC emissions from all cleanup materials employed, in pounds [i.e., sum of 3.b) times 3.c) for each cleanup material employed].

   e) The amount of cleanup material recovered, in pounds [i.e., recycling and/or disposal].

   f) The total monthly VOC emissions from cleanup operations, in pounds [i.e., 3.d) – 3.e)].

   g) The rolling, 12-month summation of VOC emissions.

4. Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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.

5. Compliance with the emission limitations in 2 above shall be determined in accordance with the following methods:

   a) <u>Emissions Limitation:</u>

      Facility wide VOC emissions from cleanup materials shall not exceed 11.3 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in 3 above.

6. The Facility-wide Terms and Conditions 2 through 5 above represent the consolidation of the cleanup material-based VOC emissions limitations and associated monitoring, record keeping and reporting established pursuant to OAC rule 3745-31-05(A)(3) for emissions units L002, K001 and K002. Specifically, the emissions limitation is based on the summation of the previous 5.5 TPY VOC emissions limit from L002 and the 2.9 TPY VOC emissions limit portion of the previous 5.0 TPY total VOC emissions limit for each K001 and K002 (i.e., 5.5 + 2.9 + 2.9 = 11.3 TPY). These cleanup emissions limitations associated with these emissions units, which also indirectly included emissions unit P001, are consolidated into these Facility-wide Terms and Conditions 2 through 5.

7. The Ohio EPA has determined that this facility may be applicable to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: http://www.epa.gov/ttn/atw/area/arearules.html.

C. Emissions Unit Terms and Conditions

1. L002, Pressure pot heads cold cleaner

Operations, Property and/or Equipment Description:

Pressure pot heads cold cleaner

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)	See b)(2)a.
b.	OAC rule 3745-21-09(O)(2)	See b)(2)b through b)(2)d.
c.	OAC rule 3745-21-09(O)(2)(e)	Exempt. See b)(2)e.

(2) Additional Terms and Conditions

a. Cleanup material-related emissions limitations and requirements are included in Section B.2 through B.6.

b. The cold cleaner shall be equipped with either:

i. A cover; and if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute measured at one hundred degrees Fahrenheit, or the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand; or

ii. A remote solvent reservoir from which solvent is pumped through a nozzle suspended over a sink-like work area which drains back to the reservoir, provided the sink-like work area has an open drain area of less than sixteen square inches and provided the solvent neither is heated above one hundred twenty degrees Fahrenheit nor has a vapor pressure greater than 0.6 pound per square inch absolute, measured at one hundred degrees Fahrenheit.

c. The cold cleaner shall be equipped with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at one hundred degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining unless an internal type drainage device cannot fit into the cleaning system.

d. The cold cleaner shall be equipped with one of the following devices if the solvent vapor pressure is greater than 0.6 pound per square inch absolute measured at one hundred degrees Fahrenheit, or if the solvent is heated above one hundred twenty degrees Fahrenheit:

i. Freeboard that gives a freeboard ratio greater than or equal to 0.7;

ii. Water cover (solvent must be insoluble in and heavier than water); or

iii. Other systems of equivalent control, such as refrigerated chiller or carbon adsorption, approved by the director.

e. Per OAC rule 3745-21-09(O)(2)(e)(iv), this emissions unit is exempt from OAC rule 3745-21-09(O)(2)(e) because it is used for the cleaning of paint gun parts for the removal of paint and coatings.

c) Operational Restrictions

(1) The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:

a. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.

b. Store waste solvent in covered containers.

c. Close the cover whenever parts are not being handled in the cleaner.

d. Drain the cleaned parts until dripping ceases.

e. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed ten pounds per square inch gauge.

f. Clean only materials that are neither porous nor absorbent.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the following information:

a. the types of solvents employed in the cold cleaner, including the chemical name(s) and concentration;

b. the vapor pressure of each solvent applied, in pound per square inch absolute, measured at 100 degrees Fahrenheit;

c. the maximum temperature at which the solvent is maintained;

d. if freeboard control is required, record of the freeboard ratio before and after each addition of make-up solvent and the date of the solvent addition; and

e. if freeboard control is required, a record of the date and nature of any other maintenance activities for the freeboard ratio control.

The records for the types of solvents employed during each year and the vapor pressure of each solvent at 100 degrees Fahrenheit shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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.

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. None.

g) Miscellaneous Requirements

(1) None.

2. P001, Paint Blending Equipment

Operations, Property and/or Equipment Description:

Paint Blending Equipment (Mixing Tanks)

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)	Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 9.5 tons per rolling, 12-month period, excluding cleanup.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions (PE) from this emissions unit shall not exceed 0.06 lb/hr. See b)(2)b.
c.	OAC rule 3745-31-05(E), as effective 12/01/06 (synthetic minor to avoid BAT)	PE from this emissions unit shall not exceed 0.24 TPY. See b)(2)c.
d.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 60% opacity.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), as effective 11/30/01. See b)(2)d.
f.	OAC rule 3745-17-11(B)(1)	PE shall not exceed 4.76 lbs/hr. See b)(2)e.

(2) Additional Terms and Conditions

a. Cleanup material-related emissions limitations and requirements are included in Section B.2 through B.6.

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 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, then these emission limitations/control measures no longer apply.

c. 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.

Permit to Install and Operate P0107049 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A(3):

i. Installation and operation of a fabric filter.

ii. PE limitation of 0.24 TPY.

d. This limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA for OAC rule 3745-31-05, as indicated in b)(2)e

above. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then this emission limitation no longer applies.

e. 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.

f. The particulate emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is processing solid ingredients.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information on a monthly basis for this emissions unit:

a. the number of gallons of coatings processed during the month in the following groups of process equipment:

i. high speed dispersion tanks (HSD);

ii. blending tote tanks (ICB);

iii. blending tanks; and,

iv. product filling equipment.

b. the PE and VOC emissions calculated as follows:

i. the product of d)(1)a.i times 0.0002 lb PE/gal* for the high speed dispersion tanks (HSD);

ii. the product of d)(1)a.i times 0.00109 lb VOC/gal* for the high speed dispersion tanks (HSD);

iii. the product of d)(1)a.ii times 0.000021 lb VOC/gal* for the blending tote tanks tanks (ICB);

iv. the product of d)(1)a.iii times 0.000748 lb VOC/gal* for the blending tanks;

v. the product of d)(1)a.iv times 0.000656 lb VOC/gal* for the product filling equipment;

vi. the total VOC emissions; i.e., the sum of d)(1)a.ii + d)(1)a.iii + d)(1)a.iv + d)(1)a.v; and,

vii. the rolling, 12-month summation of VOC emissions.

* these emissions factors were included in the permit application for PTIO P0107049 and are based on USEPA guidance documents and representative, worse-case coatings. Should more accurate emission factors be developed, the permittee shall use them, provided the new emission factors are mutually agreeable to the RAPCA and the permittee.

(2) The permittee shall perform daily checks, when the emissions unit is processing solid ingredients and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item d)(2)d above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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.

(2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(2) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

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:

VOC emissions from this emissions unit shall not exceed 9.5 tons per rolling, 12-month period, excluding cleanup.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1).

b. Emission Limitation:

PE from this emissions unit shall not exceed 0.06 lb/hr.

Applicable Compliance Method:

Compliance shall be determined using the emissions factor in d)(1)b.i and inputs representing the Potential To Emit (PTE),as follows:

Emissions = (hourly production rate) * (emission factor)

Emissions = (270 gals/hr) * (0.0002 lb PE/gal)

Emissions = 0.06 lb/hr

c. Emission Limitation:

PE from this emissions unit shall not exceed 0.24 TPY.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1) and is determined by summing the monthly VOC emissions for each month of the year.

d. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 60% opacity.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

e. Emission Limitation:

PE shall not exceed 4.76 lbs/hr.

Applicable Compliance Method:

Compliance shall be determined using the emissions factor in d)(1)b.i and inputs representing the Potential To Emit (PTE),as follows:

Emissions = (hourly production rate) * (emission factor)

Emissions = (270 gals/hr) * (0.0002 lb PE/gal)

Emissions = 0.06 lb/hr

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -Paint Spray Booths: K001, K002: K001,K002,

EU ID	Operations, Property and/or Equipment Description
K001	Paint Spray Booth #1
K002	Paint Spray Booth #2

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), as effective 11/30/01	Combined volatile organic compound (VOC) emissions from emissions units K001 and K002 shall not exceed 4.2 tons per rolling, 12-month period, excluding cleanup. See b)(2)a and b)(2)b.
b.	OAC rule 3745-31-05(E), as effective 12/01/06 (synthetic minor to avoid BAT)	Combined VOC emissions from emissions units K001 and K002 shall not exceed 4.2 tons per year (TPY), excluding cleanup. See b)(2)c.

c.	OAC rule 3745-17-11(C)	See c)(1) and c)(2).
d.	OAC rule 3745-21-09(U)(2)(e)	The permittee shall not employ more than eight gallons of coating per day for each emissions unit K001 and K002. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.

(2) Additional Terms and Conditions

a. Cleanup material-related emissions limitations and requirements are included in Section B.2 through B.6.

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 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, then these emission limitations/control measures no longer apply.

c. 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.

Permit to Install and Operate P0107049 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A(3):

i. VOC emissions limitation of 4.2 TPY.

c) Operational Restrictions

(1) The permittee shall operate the 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 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.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day each emissions unit K001 and K002:

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.

(2) The permittee shall collect and record the following information on a monthly basis for the coating materials applied in both K001 and K002 combined:

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

b. the VOC content for each or the maximum VOC content of all the coatings applied, in pounds per gallon;

c. the total VOC emissions from all coatings applied, i.e., the summation of the products of d)(2)a times d)(2)b for each individual coating applied; or the product of the maximum VOC content of all the coatings applied times the total gallons of coating employed during the month, i.e., d)(2)a times d)(2)b for worst case coating; and

d. the rolling, 12-month summation of VOC emissions.

(3) 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.

(4) 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.

(5) 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.

(6) 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.

(7) 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.

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) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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.

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. <u>Emission Limitation:</u>

Combined VOC emissions from emissions units K001 and K002 shall not exceed 4.2 tons per rolling, 12-month period, excluding cleanup.

Applicable Compliance Method:

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

b. Emission Limitation:

Combined VOC emissions from emissions units K001 and K002 shall not exceed 4.2 TPY, excluding cleanup.

Applicable Compliance Method:

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

c. Emission Limitation:

The permittee shall not employ more than eight gallons of coating per day for each emissions unit K001 and K002.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1).

g) Miscellaneous Requirements

(1) None.