



Environmental Protection Agency

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

11/14/2011

SARA CUPP
NEW MILLENIUM BUILDING SYSTEMS
7575 West Jefferson Blvd
Fort Wayne, IN 46804

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

Facility ID: 0369000036
Permit Number: P0108486
Permit Type: Initial Installation
County: Putnam

Certified Mail

| | |
|-----|------------------------------------|
| No | TOXIC REVIEW |
| No | PSD |
| No | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No | CEMS |
| No | MACT/GACT |
| No | NSPS |
| No | NESHAPS |
| No | NETTING |
| No | MAJOR NON-ATTAINMENT |
| No | MODELING SUBMITTED |
| Yes | SYNTHETIC MINOR TO AVOID TITLE V |
| Yes | FEDERALLY ENFORCABLE PTIO (FEPTIO) |

Dear Permit Holder:

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

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-NWDO; Michigan; Indiana; Canada



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: New Millennium Building Systems, LCC had submitted a PTIO application proposing to install a spray coating operation and an associated abrasive blasting operation. New Millennium has also submitted a modification request for existing sources K004-K007 to obtain a grouped synthetic minor VOC limitation. No physical change has occurred to emissions units K004-K007 and therefore, BAT will not be revisited.

3. Facility Emissions and Attainment Status: New Millennium is requesting federally enforceable restrictions and limitation on the new spray coating operation and existing coating operations to reduce the potential emissions of VOC below the Title V threshold. Putnam County is classified as attainment for all criteria pollutants.

4. Source Emissions: The company has requested that the new coating operation be incorporated into the existing grouped VOC limit of 98.84 tons for emissions units K004-K007. As such, there will be no increase in facility-wide VOC emissions as a result of this project. This PTIO will establish a federally enforceable limitation of 98.84 ton per rolling 12-month period.

5. Conclusion: The federally enforceable limitations on the potential to emit for the new and modified operations will maintain the facility's current status as a synthetic minor for Title V applicability.

6. Please provide additional notes or comments as necessary:

None

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

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| VOC | 98.84 tons |

PUBLIC NOTICE

11/14/2011 Issuance of Draft Air Pollution Permit-To-Install and Operate

NEW MILLENIUM BUILDING SYSTEMS

21739 ROAD E-16,
Continental, OH 36068

Putnam County

FACILITY DESC.: Fabricated Structural Metal Manufacturing

PERMIT #: P0108486

PERMIT TYPE: Initial Installation

PERMIT DESC: Installation of a new spray coating operation and abrasive blasting operation.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: epa.ohio.gov/dapc/permit by entering the permit # or: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461

Ohio

**Environmental
Protection Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
NEW MILLENIUM BUILDING SYSTEMS**

| | |
|----------------|-----------------------------------|
| Facility ID: | 0369000036 |
| Permit Number: | P0108486 |
| Permit Type: | Initial Installation |
| Issued: | 11/14/2011 |
| Effective: | To be entered upon final issuance |
| Expiration: | To be entered upon final issuance |



Division of Air Pollution Control
Permit-to-Install and Operate
for
NEW MILLENIUM BUILDING SYSTEMS

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Authorization

Facility ID: 0369000036
Application Number(s): A0042068, A0042651
Permit Number: P0108486
Permit Description: Installation of a new spray coating operation and abrasive blasting operation.
Permit Type: Initial Installation
Permit Fee: \$1,100.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/14/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

NEW MILLENIUM BUILDING SYSTEMS
21739 ROAD E-16
Continental, OH 36068

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:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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: P0108486

Permit Description: Installation of a new spray coating operation and abrasive blasting operation.

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

| | |
|-----------------------------------|------------------------------|
| Emissions Unit ID: | F002 |
| Company Equipment ID: | Abrasive Blasting Operations |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | K004 |
| Company Equipment ID: | Line 2 Paint Dip Tank |
| Superseded Permit Number: | 03-17444 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | K005 |
| Company Equipment ID: | Line 3 Paint Dip Tank |
| Superseded Permit Number: | 03-17444 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | K006 |
| Company Equipment ID: | Line 4 Paint Dip Tank |
| Superseded Permit Number: | 03-17444 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | K007 |
| Company Equipment ID: | Bridging Paint Dip Tank |
| Superseded Permit Number: | 03-17444 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | K008 |
| Company Equipment ID: | Spray Coating Operations |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |



A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. The permittee is advised that this facility is subject to the "Generally Available Control Technology" (GACT) requirements under 40 CFR Part 63 Subpart XXXXXX (National Emissions Standards for Hazardous Air Pollutants for Nine Metal Fabrication and Finishing Source Categories). Refer to 40 CFR 63.11516(a)(3)(i) for specific requirements in this case. The U.S. EPA is responsible for the administration of the requirements of this rule at this time. It should be noted that the enforcement authority of the GACT requirements have not been delegated to Ohio EPA at the time of this permit processing. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic Code of Federal Regulations (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. K004, Line 2 Paint Dip Tank

Operations, Property and/or Equipment Description:

Paint dip tank 2 (DT2)

- 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. b)(1)e., d)(3) through d)(6) and e)(3)
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)a., b)(2)a, b)(2)b., c)(1), d)(2), e)(1) and f)(1)b.
- 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(D) | <p>Volatile organic compounds (VOC) from coating, thinning, solvent make-up and cleanup operations for emissions units K004 through K008, combined, shall not exceed 98.84 tons per rolling, 12-month period.</p> <p>See b)(2)a. and b)(2)b.</p> |
| b. | OAC rule 3745-31-05(A)(3) | <p>7.42 lbs VOC/hr from coating operations</p> <p>109.0 lbs VOC/month from thinning, solvent make-up and cleanup operations (water reducer)</p> <p>See b)(2)c.</p> |
| d. | OAC rule 3745-21-09(U)(1)(d) | 3.5 lbs VOC per gallon coating, excluding water and exempt solvents |
| e. | ORC 3704.03(F) OAC rule 3745-114-01 | See d)(3), d)(4) and d)(5) |

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for purpose of avoiding applicability of Title V regulations:

98.84 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K004 through K008 combined [See c)(1)].

- b. The emissions of VOC from this emissions unit shall not exceed 98.84 tons per year, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

| Month(s) | Maximum Allowable Cumulative Emissions of VOC (Tons) |
|----------|--|
| 1 | 8.23 |
| 1-2 | 16.46 |
| 1-3 | 24.69 |
| 1-4 | 32.92 |
| 1-5 | 41.15 |
| 1-6 | 49.38 |
| 1-7 | 57.61 |
| 1-8 | 65.84 |
| 1-9 | 74.07 |
| 1-10 | 82.30 |
| 1-11 | 90.53 |
| 1-12 | 98.84 |

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

- c. The BAT requirements under OAC rule 3745-31-05(A)(3) have been determined to be compliance with the rolling, 12-month VOC limitation established under OAC rule 3745-31-05(D) and compliance with the requirements of OAC rule 3745-21-09(U)(1)(d).

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coating employed in emissions unit is limited by the following equation:

$$\sum_{M=1}^{12} [(V_i)(G_i)] \div 2000 \text{ lbs/ton} \leq 98.84$$

where,

- M = the increment of the rolling 12-month period;
- V_i = VOC content in pounds per gallon of each coating employed
- G_i = Gallons used of each coating for the rolling 12-month period
- n = total number of unique coatings employed in emission unit P001

Compliance with the annual restriction on the amount of coatings shall be based upon a rolling, 12-month summation.

- (2) This emissions unit shall only use materials to thin coating that can comply with the coating restriction as contained in OAC rule 3745-21-09(U)(1)(d).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for the line:
- a. the name and identification number of each coating and thinner, as applied; and
 - b. the VOC content of each coating and thinner (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings or thinners 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 each month for all coatings, thinners, solvent make-up, and cleanup materials employed in emissions units K004-K008, combined:
- a. the name and identification number of each coating, thinner, make-up solvent and cleanup material employed;
 - b. The VOC content of each coating, thinner, make-up solvent and cleanup material employed, in lbs per gallon, as applied;
 - c. the number of gallons of each coating, thinner, make-up solvent and cleanup material employed;

- d. the VOC emission rate for each coating, thinner, make-up solvent and cleanup material employed [d)(2)b. times d)(2)c.], in lbs;
 - e. the cumulative monthly VOC emission rate for all coatings, thinners, make-up solvents and cleanup materials employed [summation of d)(2)d.], in tons;
 - f. during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative VOC emissions for each calendar month; and
 - g. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC emissions.
- (3) The federally enforceable permit-to-install and operate (FEPTIO) application for emissions units, K004 through K008, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit, i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting

calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: stoddard solvent

TLV (mg/m³): 572,597

Maximum Hourly Emission Rate (lbs/hr): 4.41

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 697.04

MAGLC (ug/m³): 13,633

The permittee, has demonstrated that emissions of Stoddard solvent, from emissions units K004 through K008, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - physical changes to the emissions unit or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" 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 a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in

greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the 98.84 tons of VOC per rolling, 12-month period for emissions units K004 through K008 combined and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.



- 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 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 include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (4) 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 or thinners. 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.

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: 7.42 lbs VOC/hr from coating operations

Applicable Compliance Method: The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

* Potential to emit for this emissions unit was determined by multiplying a maximum VOC content of 0.61 lb/gallon (winter blend coating) by a maximum application rate of 12.16 gallons/hr.

- b. Emission Limitation: 98.84 tons VOC per rolling, 12-month period from coating, thinning, solvent make-up and cleanup operations for emissions units K004 through K008 combined.

Applicable Compliance Method: Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in d)(2).

- c. Emission Limitation: 109.0 lbs VOC/month from thinning, solvent make-up and cleanup operations

Applicable Compliance Method: The monthly emissions limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*Potential to emit for this emissions unit was determined by multiplying a maximum VOC content of 0.036 lb/gallon by a maximum application rate of 3037 gallons/month.

g) Miscellaneous Requirements

- (1) None.



2. K005, Line 3 Paint Dip Tank

Operations, Property and/or Equipment Description:

Paint dip tank 3 (DT3)

- 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. b)(1)e., d)(3) through d)(6) and e)(3)
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)a., b)(2)a, b)(2)b., c)(1), d)(2), e)(1) and f)(1)b.
- 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(D) | <p>Volatile organic compounds (VOC) from coating, thinning, solvent make-up and cleanup operations for emissions units K004 through K008 combined, shall not exceed 98.84 tons per rolling, 12-month period.</p> <p>See b)(2)a. and b)(2)b.</p> |
| b. | OAC rule 3745-31-05(A)(3) | <p>9.27 lbs VOC/hr from coating operations</p> <p>137.0 lbs VOC/month from thinning, solvent make-up and cleanup operation (water reducer)</p> <p>See b)(2)c.</p> |
| | OAC rule 3745-21-09(U)(1)(d) | 3.5 lbs VOC per gallon coating, excluding water and exempt solvents |
| | ORC 3704.03(F) OAC rule 3745-114-01 | See d)(3), d)(4) and d)(5) |

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for purpose of avoiding applicability of Title V regulations:

98.84 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K004 through K008 combined [See c)(1)].

- b. The emissions of VOC from this emissions unit shall not exceed 98.84 tons per year, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

| Month(s) | Maximum Allowable Cumulative Emissions of VOC (Tons) |
|----------|--|
| 1 | 8.23 |
| 1-2 | 16.46 |
| 1-3 | 24.69 |
| 1-4 | 32.92 |
| 1-5 | 41.15 |
| 1-6 | 49.38 |
| 1-7 | 57.61 |
| 1-8 | 65.84 |
| 1-9 | 74.07 |
| 1-10 | 82.30 |
| 1-11 | 90.53 |
| 1-12 | 98.84 |

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

- c. The BAT requirements under OAC rule 3745-31-05(A)(3) have been determined to be compliance with the rolling, 12-month VOC limitation established under OAC rule 3745-31-05(D) and compliance with the requirements of OAC rule 3745-21-09(U)(1)(d).

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coating employed in emissions unit is limited by the following equation:

$$\sum_{M=1}^{12} [(V_i)(G_i)] \div 2000 \text{ lbs/ton} \leq 98.84$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating employed

G_i = Gallons used of each coating for the rolling 12-month period

n = total number of unique coatings employed in emission unit P001

Compliance with the annual restriction on the amount of coatings shall be based upon a rolling, 12-month summation.

- (2) This emissions unit shall only use materials to thin coating that can comply with the coating restriction as contained in OAC rule 3745-21-09(U)(1)(d).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for the line:

- a. The name and identification number of each coating and thinner, as applied; and
- b. The VOC content of each coating and thinner (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings or thinners 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 each month for all coatings, thinners, solvent make-up, and cleanup materials employed in emissions units K004-K008 combined:

- a. the name and identification number of each coating, thinner, make-up solvent and cleanup material employed;
- b. the VOC content of each coating, thinner, make-up solvent and cleanup material employed, in lbs per gallon, as applied;
- c. the number of gallons of each coating, thinner, make-up solvent and cleanup material employed;

- d. the VOC emission rate for each coating, thinner, make-up solvent and cleanup material employed [d)(2)b. times d)(2)c.], in lbs;
 - e. the cumulative monthly VOC emission rate for all coatings, thinner, make-up solvent and cleanup materials employed [summation of d)(2)d.], in tons;
 - f. during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative VOC emissions for each calendar month; and
 - g. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC emissions.
- (3) The federally enforceable permit-to-install and operate (FEPTIO) application for emissions units, K004 through K008, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit, i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting

calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: stoddard solvent

TLV (mg/m³): 572,597

Maximum Hourly Emission Rate (lbs/hr): 4.41

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 697.04

MAGLC (ug/m³): 13,633

The permittee, has demonstrated that emissions of Stoddard solvent, from emissions units K004 through K008, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - physical changes to the emissions unit or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" 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 a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in

greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) **Reporting Requirements**

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the 98.84 tons of VOC per rolling, 12-month period for emissions units K004 through K008 combined and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.



- 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 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 include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (4) 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 or thinners. 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.

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: 9.27 lbs VOC/hr from coating operations

Applicable Compliance Method: The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

* Potential to emit for this emissions unit was determined by multiplying a maximum VOC content of 0.61 lb/gallon (winter blend coating) by a maximum application rate of 15.20 gallons/hr.

- b. Emission Limitation: 98.84 tons VOC per rolling, 12-month period from coating, thinning, solvent make-up and cleanup operations for emissions units K004 through K008 combined.

Applicable Compliance Method: Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in d)(2).

- c. Emission Limitation: 137.0 lbs VOC/month from thinning, solvent make-up and cleanup operations

Applicable Compliance Method: The monthly emissions limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*Potential to emit for this emissions unit was determined by multiplying a maximum VOC content of 0.036 lb/gallon by a maximum application rate of 3796 gallons/month.

g) Miscellaneous Requirements

- (1) None.



3. K006, Line 4 Paint Dip Tank

Operations, Property and/or Equipment Description:

Paint dip tank 4 (DT4)

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. b)(1)e., d)(3) through d)(6) and e)(3)

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

a. b)(1)a., b)(2)a, b)(2)b., c)(1), d)(2), e)(1) and f)(1)b.

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(D) | <p>Volatile organic compounds (VOC) from coating, thinning, solvent make-up and cleanup operations for emissions units K004 through K008 combined, shall not exceed 98.84 tons per rolling, 12-month period.</p> <p>See b)(2)a. and b)(2)b.</p> |
| b. | OAC rule 3745-31-05(A)(3) | <p>6.49 lbs VOC/hr from coating operations</p> <p>96.0 lbs VOC/month from thinning, solvent make-up and cleanup operation (water reducer)</p> <p>See b)(2)c.</p> |
| | OAC rule 3745-21-09(U)(1)(d) | 3.5 lbs VOC per gallon coating, excluding water and exempt solvents |
| | ORC 3704.03(F) OAC rule 3745-114-01 | See d)(3), d)(4) and d)(5) |

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for purpose of avoiding applicability of Title V regulations:

98.84 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K004 through K008 combined [See c)(1)].

- b. The emissions of VOC from this emissions unit shall not exceed 98.84 tons per year, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

| Month(s) | Maximum Allowable Cumulative Emissions of VOC (Tons) |
|----------|--|
| 1 | 8.23 |
| 1-2 | 16.46 |
| 1-3 | 24.69 |
| 1-4 | 32.92 |
| 1-5 | 41.15 |
| 1-6 | 49.38 |
| 1-7 | 57.61 |
| 1-8 | 65.84 |
| 1-9 | 74.07 |
| 1-10 | 82.30 |
| 1-11 | 90.53 |
| 1-12 | 98.84 |

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

- c. The BAT requirements under OAC rule 3745-31-05(A)(3) have been determined to be compliance with the rolling, 12-month VOC limitation established under OAC rule 3745-31-05(D) and compliance with the requirements of OAC rule 3745-21-09(U)(1)(d).

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coating employed in emissions unit is limited by the following equation:

$$\sum_{M=1}^{12} [(V_i)(G_i)] \div 2000 \text{ lbs/ton} \leq 98.84$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating employed

G_i = Gallons used of each coating for the rolling 12-month period

n = total number of unique coatings employed in emission unit P001

Compliance with the annual restriction on the amount of coatings shall be based upon a rolling, 12-month summation.

- (2) This emissions unit shall only use materials to thin coating that can comply with the coating restriction as contained in OAC rule 3745-21-09(U)(1)(d).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for the line:
- a. The name and identification number of each coating and thinner, as applied; and
 - b. The VOC content of each coating and thinner (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings or thinners 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 each month for all coatings, thinners, solvent make-up, and cleanup materials employed in emissions units K004-K008 combined:
- a. the name and identification number of each coating, thinner, make-up solvent and cleanup material employed;
 - b. the VOC content of each coating, thinner, make-up solvent and cleanup material employed, in lbs per gallon, as applied;
 - c. the number of gallons of each coating, thinner, make-up solvent and cleanup material employed;

- d. the VOC emission rate for each coating, thinner, make-up solvent and cleanup material employed [d)(2)b. times d)(2)c.], in lbs;
 - e. the cumulative monthly VOC emission rate for all coatings, thinner, make-up solvent and cleanup materials employed [summation of d)(2)d.], in tons;
 - f. during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative VOC emissions for each calendar month; and
 - g. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC emissions.
- (3) The federally enforceable permit-to-install and operate (FEPTIO) application for emissions units, K004 through K008, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit, i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting

calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: stoddard solvent

TLV (mg/m³): 572,597

Maximum Hourly Emission Rate (lbs/hr): 4.41

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 697.04

MAGLC (ug/m³): 13,633

The permittee, has demonstrated that emissions of Stoddard solvent, from emissions units K004 through K008, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - physical changes to the emissions unit or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" 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 a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in

greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
 - (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the 98.84 tons of VOC per rolling, 12-month period for emissions units K004 through K008 combined and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

- 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 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 include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (4) 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 or thinners. 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.

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: 6.49 lbs VOC/hr from coating operations

Applicable Compliance Method: The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

* Potential to emit for this emissions unit was determined by multiplying a maximum VOC content of 0.61 lb/gallon (winter blend coating) by a maximum application rate of 10.64 gallons/hr.

- b. Emission Limitation: 98.84 tons VOC per rolling, 12-month period from coating, thinning, solvent make-up and cleanup operations for emissions units K004 through K008 combined.

Applicable Compliance Method: Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in d)(2).

- c. Emission Limitation: 96.0 lbs VOC/month from thinning, solvent make-up and cleanup operations

Applicable Compliance Method: The monthly emissions limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*Potential to emit for this emissions unit was determined by multiplying a maximum VOC content of 0.036 lb/gallon by a maximum application rate of 2657 gallons/month.

g) Miscellaneous Requirements

- (1) None.



4. K007, Bridging Paint Dip Tank

Operations, Property and/or Equipment Description:

Paint dip tank 5 (DT5 - Bridging)

- 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. b)(1)e., d)(3) through d)(6) and e)(3)
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)a., b)(2)a, b)(2)b., c)(1), d)(2), e)(1) and f)(1)b.
- 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(D) | <p>Volatile organic compounds (VOC) from coating, thinning, solvent make-up and cleanup operations for emissions units K004 through K008 combined, shall not exceed 98.84 tons per rolling, 12-month period.</p> <p>See b)(2)a. and b)(2)b.</p> |
| b. | OAC rule 3745-31-05(A)(3) | <p>2.78 lbs VOC/hr from coating operations</p> <p>41.0 lbs VOC/month from thinning, solvent make-up and cleanup operation (water reducer)</p> <p>See b)(2)c.</p> |
| | OAC rule 3745-21-09(U)(1)(d) | 3.5 lbs VOC per gallon coating, excluding water and exempt solvents |
| | ORC 3704.03(F) OAC rule 3745-114-01 | See d)(3), d)(4) and d)(5) |

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for purpose of avoiding applicability of Title V regulations:

98.84 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K004 through K008 combined [See c)(1)].

- b. The emissions of VOC from this emissions unit shall not exceed 98.84 tons per year, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

| Month(s) | Maximum Allowable Cumulative Emissions of VOC (Tons) |
|----------|--|
| 1 | 8.23 |
| 1-2 | 16.46 |
| 1-3 | 24.69 |
| 1-4 | 32.92 |
| 1-5 | 41.15 |
| 1-6 | 49.38 |
| 1-7 | 57.61 |
| 1-8 | 65.84 |
| 1-9 | 74.07 |
| 1-10 | 82.30 |
| 1-11 | 90.53 |
| 1-12 | 98.84 |

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

- c. The BAT requirements under OAC rule 3745-31-05(A)(3) have been determined to be compliance with the rolling, 12-month VOC limitation established under OAC rule 3745-31-05(D) and compliance with the requirements of OAC rule 3745-21-09(U)(1)(d).

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coating employed in emissions unit is limited by the following equation:

$$\sum_{M=1}^{12} [(V_i)(G_i)] \div 2000 \text{ lbs/ton} \leq 98.84$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating employed

G_i = Gallons used of each coating for the rolling 12-month period

n = total number of unique coatings employed in emission unit P001

Compliance with the annual restriction on the amount of coatings shall be based upon a rolling, 12-month summation.

- (2) This emissions unit shall only use materials to thin coating that can comply with the coating restriction as contained in OAC rule 3745-21-09(U)(1)(d).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for the line:
- a. The name and identification number of each coating and thinner, as applied; and
 - b. The VOC content of each coating and thinner (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings or thinners 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 each month for all coatings, thinners, solvent make-up, and cleanup materials employed in emissions units K004-K008 combined:
- a. the name and identification number of each coating, thinner, make-up solvent and cleanup material employed;
 - b. the VOC content of each coating, thinner, make-up solvent and cleanup material employed, in lbs per gallon, as applied;
 - c. the number of gallons of each coating, thinner, make-up solvent and cleanup material employed;

- d. the VOC emission rate for each coating, thinner, make-up solvent and cleanup material employed [d)(2)b. times d)(2)c.], in lbs;
 - e. the cumulative monthly VOC emission rate for all coatings, thinner, make-up solvent and cleanup materials employed [summation of d)(2)d.], in tons;
 - f. during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative VOC emissions for each calendar month; and
 - g. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC emissions.
- (3) The federally enforceable permit-to-install and operate (FEPTIO) application for emissions units, K004 through K008, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit, i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting

calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: stoddard solvent

TLV (mg/m³): 572,597

Maximum Hourly Emission Rate (lbs/hr): 4.41

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 697.04

MAGLC (ug/m³): 13,633

The permittee, has demonstrated that emissions of Stoddard solvent, from emissions units K004 through K008, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - physical changes to the emissions unit or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" 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 a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in

greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) **Reporting Requirements**

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the 98.84 tons of VOC per rolling, 12-month period for emissions units K004 through K008 combined and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.



- 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 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 include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (4) 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 or thinners. 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.

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: 2.78 lbs VOC/hr from coating operations

Applicable Compliance Method: The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

* Potential to emit for this emissions unit was determined by multiplying a maximum VOC content of 0.61 lb/gallon (winter blend coating) by a maximum application rate of 4.56 gallons/hr.

Effective Date: To be entered upon final issuance

- b. Emission Limitation: 98.84 tons VOC per rolling, 12-month period from coating, thinning, solvent make-up and cleanup operations for emissions units K004 through K008 combined.

Applicable Compliance Method: Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in d)(2).

- c. Emission Limitation: 41.0 lbs VOC/month from thinning, solvent make-up and cleanup operations

Applicable Compliance Method: The monthly emissions limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*Potential to emit for this emissions unit was determined by multiplying a maximum VOC content of 0.036 lb/gallon by a maximum application rate of 1139 gallons/month.

g) Miscellaneous Requirements

- (1) None.



5. K008, Spray Coating Operations

Operations, Property and/or Equipment Description:

Spray Coating Operations

- 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. b)(1)g., d)(4) through d)(7) and e)(3)
(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
a. b)(1)a., b)(2)a., b)(2)b., c)(2), d)(2), e)(1) and f)(1)b.
b) Applicable Emissions Limitations and/or Control Requirements
(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 3 columns: Row Label, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-31-05(D), OAC rule 3745-31-05(F), OAC rule 3745-31-05(A)(3), OAC rule 3745-05(A)(3), OAC rule 3745-21-09(U)(1)(d), and OAC rule 3745-17-11(C).



Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row g: ORC 3704.03(F), OAC rule 3745-114-01; See d)(4) through d)(7)

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for purpose of avoiding applicability of Title V regulations:

98.84 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K004 through K008 combined [See c)(1)].

b. The emissions of VOC from this emissions unit shall not exceed 98.84 tons per year, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Table with 2 columns: Month(s), Maximum Allowable Cumulative Emissions of VOC (Tons). Rows 1-12 showing cumulative values from 8.23 to 98.84.

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

- c. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1):
- i. 17.5 lbs VOC/day
- d. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 have been determined to be compliance with rolling, 12-month VOC limitation established under OAC rule 3745-31-05(D) [See b)(2)a.], compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [See b)(2)c.] and compliance with the requirements of OAC rule 3745-21-09(U)(1)(d).

The voluntary restrictions were intentionally established to be consistent with the BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 for two specific purposes as indicated below:

- i. BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 would be fulfilled by compliance with the voluntary restrictions; and
- ii. The emissions unit will avoid any BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [see b)(2)e.].

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not 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 3745-31-05, the requirements of 3745-31-05(A)(3) as effective 12-1-06 will no longer apply.

It should also be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) and OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

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

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the VOC emissions from this air contaminant source since the potential to emit (PTE) is less than 10 tons per year taking into consideration the practically and legally enforceable voluntary restrictions established under OAC rule 3745-31-05(F) in this permit.



f. This emissions unit is exempt from the requirements of OAC rule 3745-17-11(C) per OAC rule 3745-17-11(A)(1)(i).

c) Operational Restrictions

(1) The following operational restriction has been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit potential to emit [See b)(2)c.):

a. The permittee shall restrict coating usage to less than five gallons per day.

(2) The maximum rolling, 12-month quantity of coating employed in emissions unit is limited by the following equation:

12
ΣΣ [(V_i)(G_i)] ÷ 2000 lbs/ton ≤ 98.84
M=1 i=1

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating employed

G_i = Gallons used of each coating for the rolling 12-month period

n = total number of unique coatings employed in emission unit P001

Compliance with the annual restriction on the amount of coatings shall be based upon a rolling, 12-month summation.

(3) This emissions unit shall only use materials to thin coating that can comply with the coating restriction as contained in OAC rule 3745-21-09(U)(1)(d).

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the line:

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

b. The VOC content of each coating and thinner (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings or thinners 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 each month for all coatings, thinners, solvent make-up, and cleanup materials employed in emissions units K004-K008 combined:

- a. the name and identification number of each coating, thinner, make-up solvent and cleanup material employed;
 - b. the VOC content of each coating, thinner, make-up solvent and cleanup material employed, in lbs per gallon, as applied;
 - c. the number of gallons of each coating, thinner, make-up solvent and cleanup material employed;
 - d. the VOC emission rate for each coating, thinner, make-up solvent and cleanup material employed [d)(2)b. times d)(2)c.], in lbs;
 - e. the cumulative monthly VOC emission rate for all coatings, thinner, make-up solvent and cleanup materials employed [summation of d)(2)d.], in tons;
 - f. during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative VOC emissions for each calendar month; and
 - g. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC emissions.
- (3) The permittee shall collect and record the following information daily for this emissions unit:
- a. the name and identification number of each coating employed;
 - b. the VOC content of each coating employed, in lbs per gallon, as applied;
 - c. the number of gallons of each coating employed;
 - d. the VOC emission rate for each coating employed [d)(3)b. times d)(3)c.], in lbs;
 - e. the cumulative daily VOC emission rate for all coatings employed [summation of d)(3)d.], in lbs;
- (4) The federally enforceable permit-to-install and operate (FEPTIO) application for emissions units, K004 through K008, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic

compound(s) emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit, i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: stoddard solvent

TLV (mg/m³): 572,597

Maximum Hourly Emission Rate (lbs/hr): 4.41

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 697.04

MAGLC (ug/m³): 13,633

The permittee, has demonstrated that emissions of Stoddard solvent, from emissions units K004 through K008, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (5) Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can

affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" 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 a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

- (7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the 98.84 tons of VOC per rolling, 12-month period for emissions units K004 through K008 combined and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels;
 - 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 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 include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (4) 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

or thinners. 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.

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: 17.5 lbs VOC/day from coating operations

Applicable Compliance Method: Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in d)(3).

b. Emission Limitation: 98.84 tons VOC per rolling, 12-month period from coating, thinning, solvent make-up and cleanup operations for emissions units K004 through K008 combined.

Applicable Compliance Method: Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in d)(2).

c. Emission Limitation: 128.4 lbs VOC/month from cleanup solvent

Applicable Compliance Method: The monthly emission limitation represents the potential to emit* for this emissions unit. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

*Potential to emit for this emissions unit was determined by multiplying a maximum VOC content of 6.42 lbs/gallon by a maximum application rate of 20.0 gallons/month.

g) Miscellaneous Requirements

(1) None.



6. F002, Abrasive Blasting Operations

Operations, Property and/or Equipment Description:

Abrasive Blasting Operations

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 | Particulate matter emissions 10 microns or less in diameter (PM ₁₀) shall not exceed 5.70 TPY. Visible particulate fugitive emissions from this emissions unit shall not exceed 20% opacity as a three-minute average from the building enclosing this emissions unit. See b)(2)a. and b)(2)b. |
| b. | OAC rule 3745-05(A)(3), as effective 12/01/06 | See b)(2)c |
| c. | OAC rule 3745-17-08(A) | See b)(2)d. |
| d. | OAC rule 3745-17-07(B)(1) | See b)(2)e. |

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 have been determined to be:

- i. the permittee shall enclose all abrasive material storage areas, holding bins, seal chutes and conveyors that transport abrasive material;
 - ii. all equipment associated with dry abrasive blasting operations shall be operated according to manufacturer's instructions;
 - iii. the permittee shall not re-use abrasive blasting media unless contaminants have been removed by filtration or screening, and abrasive material conforms to its original size; and
 - iv. whenever practical, permittee shall switch from a high particulate matter (PM)-emitting blast media (e.g., sand) to low PM-emitting blast media (e.g., crushed glass, specular hematite, steel shot, aluminum oxide).
- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not 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 3745-31-05, the requirements of 3745-31-05(A)(3) as effective 12-1-06 will 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 SIP.
- The Best Available Technology requirements (BAT) under OAC rule 3745-31-05(A)(3) do not apply to the PM₁₀ emissions from this air contaminant source since the uncontrolled potential to emit for PM₁₀ emissions is less than 10 tons per year.
- d. New Millenium Building Systems is not located within an Appendix A area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08 (A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08 (B)(1).
- e. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07 (B)(11)(e).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and

when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive 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 location and 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 emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission ended. The observer may indicate that the visible emission 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 12 months for each air contaminant source identified in this permit.
- (2) The permittee shall additionally identify the following information in the annual PER in accordance with the monitoring requirements in term number d)(1) above:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or instance(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that all inspections were performed by the required frequency, and control measure(s) were properly implemented.

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: Particulate matter emissions 10 microns or less in diameter (PM₁₀) shall not exceed 5.70 TPY.

Applicable Compliance Method: The annual emission limitation was developed by multiplying the hourly mass emission limitation* by 8760 hours per year, and then dividing by 2000.

The hourly mass emission limitation was determined by multiplying the emission factor from AP-42, Table 13.2.6-1 (9/97) for sandblasting (0.013 lb PM₁₀/lb abrasive) with the maximum abrasive usage rate from the application (100 lbs/hr).

b. Emission Limitation: Visible particulate emissions shall not exceed 20% opacity as a three-minute average from the building enclosing this emissions unit.

Applicable Compliance Method: If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in Appendix on Test Methods in 40 CFR, Part 60 (Standards of Performance for New Stationary Sources), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

(1) None.