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

Certified Mail

2/7/2012

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
Yes	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Mr. Greg Steinecker
UNVERFERTH MFG CO INC - DELPHOS DIVISION
24325 St. Rt. 697 West
Delphos, OH 45833

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

Facility ID: 0381000012
Permit Number: P0109233
Permit Type: Initial Installation
County: Van Wert

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO)for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Times Bulletin. 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

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

PUBLIC NOTICE
2/7/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

UNVERFERTH MFG CO INC - DELPHOS DIVISION
24325 Ohio 697,
Delphos, OH 45833
Van Wert County
FACILITY DESC.: Farm Machinery and Equipment Manufacturing
PERMIT #: P0109233
PERMIT TYPE: Initial Installation
PERMIT DESC: Initial installation for Paint Booth #5 (K001) and Final Assembly Area (K002) and Chapter 31 Modification for Paint Booth #1 (R001), Paint Booth #2 (R002) and Paint Booth #4 (R004).

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: http://epa.ohio.gov/dapc/permitsonline.aspx 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

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   Netting Determination

2. Source Description:

   UnverferthMfg Co Inc. is a farm machining and equipment manufacturer located in Van Wert County. The company has submitted a PTIO application for the installation of a paint spray booth (K001) and final assembly area (K002). Unverferth has also submitted a modification request for three existing paint spray booths (R001, R002 and R004).

3. Facility Emissions and Attainment Status:

   Unverferth Mfg. is located in Van Wert County and is classified as a synthetic minor facility for Title V and is not considered a "major source" for MACT. Van Wert County is designated attainment for all criteria pollutants.

4. Source Emissions:

   Unverferth has proposed to increase their existing coating usage and cleanup rate restrictions and their federally enforceable VOC emission limitations for R001, R002 and R004 to include the addition of K001. The company will also take usage restrictions and federally enforceable VOC emission limitations for K002. These changes will result in an increase from 33.67 tons of VOC per rolling, 12-month period to 74.87 tons of VOC per rolling, 12-month period for the facility. In addition, the company has requested that K001 and K002 be included in their existing federally enforceable limitations to restrict the hazardous air pollutants (HAPs) to 9.90 tons per rolling, 12-month period for any individual HAPs and 24.90 tons per rolling, 12-month period for any combination of HAPs.

5. Conclusion:

   As part of the company's strategy to avoid Title V and MACT applicability, this FEPTIO will incorporate federally enforceable permit conditions to limit the facility's VOC emissions to 74.87 tons of VOC per rolling, 12-month period and limit the facility's HAPs emissions to 9.9 tons per rolling, 12-month period for any individual HAP and 24.90 tons per rolling, 12-month period for any combination of HAPs. Therefore, the company will remain a synthetic minor facility and Title V and MACT permitting requirements will not apply.

6. Please provide additional notes or comments as necessary:

   None

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

Pollutant	Tons Per Year
VOC	74.87
Individual HAP	9.90
Combined HAPs	24.90

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
UNVERFERTH MFG CO INC - DELPHOS DIVISION

Facility ID:	0381000012
Permit Number:	P0109233
Permit Type:	Initial Installation
Issued:	2/7/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
UNVERFERTH MFG CO INC - DELPHOS DIVISION

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Authorization

Facility ID: 0381000012
Application Number(s): A0043360, A0043499
Permit Number: P0109233
Permit Description: Initial installation for Paint Booth #5 (K001) and Final Assembly Area (K002) and Chapter 31 Modification for Paint Booth #1 (R001), Paint Booth #2 (R002) and Paint Booth #4 (R004).
Permit Type: Initial Installation
Permit Fee: $1,000.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 2/7/2012
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:

UNVERFERTH MFG CO INC - DELPHOS DIVISION
24325 Ohio 697
Delphos, OH 45833

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: P0109233
Permit Description: Initial installation for Paint Booth #5 (K001) and Final Assembly Area (K002) and Chapter 31 Modification for Paint Booth #1 (R001), Paint Booth #2 (R002) and Paint Booth #4 (R004).

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

Emissions Unit ID:	**K002**
Company Equipment ID:	Final Assembly Area
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Paint Booths

Emissions Unit ID:	**K001**
Company Equipment ID:	Paint Booth #5
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R001**
Company Equipment ID:	#1 South Booth
Superseded Permit Number:	03-17029
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R002**
Company Equipment ID:	#2 Middle Booth
Superseded Permit Number:	03-17029
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R004**
Company Equipment ID:	#4 North Main Booth
Superseded Permit Number:	03-17029
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is 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 submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

2. The permittee is advised that this facility is subject to the "Generally Available Control Technology" (GACT) requirements under 40 CFR Part 63 Subpart HHHHHH (National Emission Standards for Hazardous Air Pollutants: Painting Stripping and Miscellaneous Metal Surface Coating Operations). 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 has not been delegated to the 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 Northwest District Office.

C. Emissions Unit Terms and Conditions

1. K002, Final Assembly Area

Operations, Property and/or Equipment Description:

The final assembly area used to apply aerosol touch-up paint and caulk to seams of the agriculture equipment.

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)d., d)(4), d)(5), d)(6), d)(7) and e)(5)

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

a. b)(1)b., b)(2)b., c)(1), d)(2), d)(3), e)(2), f)(1)c., f)(1)d. and f)(1)e.

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.	(3)	198.72 lbs volatile organic compounds (VOC)/day from coatings See b)(2)a.
b.		3.97 tons VOC per rolling, 12-month period from coatings 9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units R001, R002, R004, K001 and K002,combined See b)(2)b. and c)(1)
c.	OAC rule 3745-21-09(U)(2)(e)(iii)	
d.		and e)(5)

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements for this emissions unit have been-determined to be compliance with OAC rule 3745-21-09(U)(2)(e)(iii) and OAC rule 3745-31-05(D) and compliance with the terms and conditions of this permit.

b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 3.97 tons VOC per rolling, 12-month period based on the coatings gallon usage restriction [see c)(1)].

ii. Annual HAP emissions from emissions units R001, R002, R004, K001 and K002, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs. Compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

Rolling emission limitations for individual and combined HAPs were initially established in Permit to Install (PTI) #03-17029, issued on 3/7/06. Since rolling HAP emission records exist from the previously issued PTI, it is not necessary to establish federally enforceable restrictions for the first 12 calendar months of operation under the provisions of this permit.

c. The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

c) Operational Restrictions

(1) The maximum annual coating usage rate for this emissions unit shall not exceed 2,364 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the coating usage rates specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage Rates
1	197
1-2	394
1-3	591
1-4	788
1-5	985
1-6	1182
1-7	1379
1-8	1576
1-9	1773
1-10	1970

1-11	2167
1-12	2364

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coatings usage restriction shall be based upon a rolling, 12-month summation of the monthly coatings usage rates.

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification number of each coating employed;

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

c. the number of gallons of each coating employed;

d. the total number of gallons of all the coatings employed;

e. the VOC emissions from each coating employed, in pounds [d)(1)b. x d)(1)c.]

f. the total VOC emissions from all the coatings employed, in pounds [the summation of d)(1)e for all the coatings.].

(2) The permittee shall collect and record the following information each month for all the coatings employed in this emissions unit:

a. For the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;

b. Beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling 12-month VOC emission rates, in tons.

c. For the first 12 months of operation, following the issuance of this permit, the cumulative coatings usage rate, in gallons; and

d. Beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month coatings usage rate, in gallons.

(3) The permittee shall collect and record the following HAP information each month for emissions units R001, R002, R004, K001 and K002, combined:

a. the company identification of each coating and cleanup material employed;

b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;

c. the number of gallons of each coating and cleanup material employed;

d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(3)b. x d)(3)c.] for each individual HAP, in lbs;

e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed for each individual HAP, the summation of d)(3)d. for all coatings and cleanup materials], in lbs;

f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed [summation of d)(3)e. for all HAPs for all coatings and cleanup materials], in lbs;

g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

(4) The FEPTIO application for these emissions units, R001, R002, R004, K001 and K002, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) 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(s), (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(s), 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 x 8/X x 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: xylene w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 434 (*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 7.46 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 286.54

MAGLC (ug/m3): 10,333

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: toluene w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 188 (*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 8.28 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 134

MAGLC (ug/m3): 4476

The permittee, has demonstrated that emissions of xylene and toluene, from emissions units R001, R002, R004, K001 and K002 are 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(s), 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(s) 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) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

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 3.97tons VOC per rolling, 12-month period emission limitation;

ii. all exceedances of the 9.9 tons per rolling, 12- month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units R001, R002, R004, K001 and K002combined emission limitations; and

iii. all exceedances of the rolling, 12-month limitation on coating usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage 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.

(3) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 10 gallons per day. The notification shall include a copy of such record and shall be sent to the appropriate District Office or local air agency within 30 days after the exceedance occurs.

(4) 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.

(5) 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.

f) Testing Requirements

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

a. Emissions Limitation:

Use no more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

Applicable Compliance Method:

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

b. Emission Limitation:

198.72 lbs VOC/day from coatings

Applicable Compliance Method:
Compliance with the daily VOC emission limitation shall be based upon the record keeping specified in d)(1).

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission imitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

c. Emission Limitation:

Annual HAP emissions from R001, R002, R004, K001 and K002, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combinations of HAPs.

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be based upon record keeping requirements specified in section d)(3) of this permit.

d. Emission Limitation:

3.97tons VOC per rolling, 12-month period from coatings

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in d)(2) of this permit.

e. Emission Limitation:

The maximum annual coating usage rate for this emissions unit shall not exceed 2,364 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

Applicable Compliance Method:

Compliance with the annual allowable coating usages restriction above shall be based upon the record keeping requirements specified in section d)(2) of this permit.

(2) In accordance with OAC rule 3745-21-10, U.S. EPA Method 24 shall be used to determine the VOC content of coatings, where formulation data is not based on the same method or if it is determined to be necessary by the Director.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group -Paint Booths: K001,R001,R002,R004

EU ID	Operations, Property and/or Equipment Description
K001	Paint Booth #5 used to top coat grain carts
R001	Paint Booth No. 1
R002	Paint Booth No. 2
R004	Paint Booth No. 4

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)(10), d)(11), d)(12), d)(13) and e)(4)

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

a. b)(1)b., b)(2)b., c)(1) through c)(4), d)(1) through d)(4), e)(2), f)(1)b., f)(1)c., f)(1)e., f)(1)g., f)(1)i., f)(1)j. and f)(1)k.

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.	ORC 3704.03(T)	See b)(2)a.
b.	OAC rule 3745-31-05(D)	R001: 23.14lbsvolatile organic compounds (VOC)/hr,from coating operations, 2696 lbs VOC/month from cleanup operations and5.95 lbs VOC/hr from peelable booth coatings R002: 31.82 lbs VOC/hr, from coating operations, 2696 lbs VOC/month, from cleanup operations and 5.95 lbs VOC/hr, from peelable booth coatings R004: 41.51lbs VOC/hr, from coating operations, 2696 lbs VOC/month, from cleanup operations and 5.95 lbs VOC/hr,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		from peelable booth coatings K001: 59.15 lbs VOC/hr from coating operations, 2696 lbs VOC/month, from cleanup operations and 5.95 lbs VOC/hr from peelable booth coatings 52.50 tons of VOC per rolling,12-month period, from the coatingoperations for emissions units R001, R002, R004**,** and K001, combined 9.9 tons per rolling, 12- monthperiod for any individualHazardous Air Pollutant (HAP)and 24.9 tons per rolling,12-month period for any combination of HAPs for emissions units R001, R002, R004, K001 and K002,combined 14.83 tons VOC per rolling, 12-month period, from cleanup operations for emissions units R001, R002, R004, and K001, combined 3.57 tons per rolling, 12-month period for emissions units R001, R002, R004 and K001, combined, from peelable booth coatings See b)(2)b. and c)(1) through c)(4)
c.	OAC rule 3745-17-11(C)	See c)(5) and c)(6)
d.	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents
e.	OAC rule 3745-114 ORC 3704.03(F)	See d)(10) through d)(13) and e)(4)

(2) Additional Terms and Conditions

a. These air contaminant sources individually have the potential to emit of ten or more tons per year of volatile organic compounds (VOC), and as such, shall meet the requirements of ORC 3704.03(T). The BAT requirements established under ORC 3704.03(T) have been determined to be compliance with OAC rule 3745-31-05(D).

b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 52.50 tons VOC per rolling, 12-month period from coating operations [based on coating usage restrictions for emissions units R001, R002, R004, and K001, combined]. [See c)(1)].

ii. 14.83 tons VOC per rolling, 12-month period, from cleanup operations for emissions units R001, R002, R004, and K001, combined, based on cleanup material usage restrictions. [See c)(2)]

iii. 3.57 tons per rolling, 12-month period for emissions units R001, R002, R004 and K001, combined from peelable booth coatings based on coating usage restrictions and VOC content restrictions. [See c)(3) and c)(4)].

iv. Annual HAP emissions from emissions units R001, R002, R004, K001 and K002, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs. Compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

Rolling emission limitations for individual and combined HAPs were initially established in Permit to Install (PTI) #03-71029, issued on 3/7/06. Since rolling HAP emission records exist from the previously issued PTI, it is not necessary to establish federally enforceable restrictions for the first 12 calendar months of operation under the provisions of this permit.

c) Operational Restrictions

(1) The maximum annual coating usage rate for emissions units R001, R002, R004 and K001, combined, shall not exceed 30,000 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the coating usage rates specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage Rates
1	2500
1-2	5000
1-3	7500
1-4	10,000
1-5	12,500
1-6	15,000
1-7	17,500
1-8	20,000
1-9	22,500

1-10	25,000
1-11	27,500
1-12	30,000

After the first 12 calendar months of operation following the issuance of this permit,compliance with the annual coating usage limitation shall be based upon a rolling,12-month summation of the monthly coating usage rates.

(2) The maximum annual cleanup material usage rate for emissions units R001, R002, R004 and K001, combined, shall not exceed 4400 gallons, based upon a rolling, 12-month summation of the monthly cleanup material usage rates.

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cleanup material usage rates specified in the following table:

Month(s)	Maximum Allowable Cumulative Cleanup Material Usage Rates
1	367
1-2	734
1-3	1101
1-4	1468
1-5	1835
1-6	2202
1-7	2569
1-8	2936
1-9	3303
1-10	3670
1-11	4037
1-12	4400

After the first 12 calendar months of operation following the issuance of this permit,compliance with the annual cleanup material usage limitation shall be based upon a rolling,12-month summation of the monthly cleanup material usage rates.

(3) The maximum annual peelable booth coating usage rate for emissions units R001, R002, R004 and K001, combined, shall not exceed 1200 gallons, based upon a rolling, 12-month summation of the monthly peelable booth coating usage rates.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the peelable booth coating usage rates specified in the following table:

Month(s)	Maximum Allowable Cumulative Peelable Booth Coating Usage Rates
1	100
1-2	200
1-3	300
1-4	400
1-5	500
1-6	600

1-7	700
1-8	800
1-9	900
1-10	1000
1-11	1100
1-12	1200

After the first 12 calendar months of operation following the issuance of this permit,compliance with the annualpeelable booth coating usage limitation shall be based upon a rolling,12-month summation of the monthlypeelable booth coating usage rates.

(4) The VOC content of each peelable booth coating employed in emissions units R001, R002, R004 and K001 shall not exceed 5.95 lbs per gallon, as applied.

Note: The peelable booth coatings employed in these emissions units are not subject to OAC rule 3745-21-09(U) as they are not applied to miscellaneous metal parts.

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

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for all the coatings employed for emissions units R001, R002, R004 and K001, combined:

a. the name and identification number of each coating employed;

b. the number of gallons of each coating employed;

c. the total number of gallons of all the coatings employed [summation of d)(1)b. for all coatings];

d. for the first 12 months of operation following the issuance of this permit, the cumulative coatings usage rate, in gallons;

e. beginning the first month after the first 12 calendar months of operation followingthe issuance of this permit, the rolling, 12-month coatings usage rate, in gallons;

f. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gal [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{voc,2}$];

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

h. the VOC emission rate for each coating employed [d)(1)b. x d)(1)g.], in pounds;

i. the total VOC emission rate for all the coatings employed [summation of d)(1)h. for all coatings.], in pounds or tons;

j. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons; and

k. beginning the first month after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

Note: The information required above must be recorded for the materials as applied,including any thinning solvents added at the emissions units.

(2) The permittee shall collect and record the following information each month for all the cleanup materials employed for emissions units R001, R002, R004 and K001, combined:

a. the name and identification number of each cleanup material employed;

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

c. the total number of gallons of all the cleanup materials employed [summation of d)(2)b. for all coatings];

d. for the first 12 months of operation, following the issuance of this permit, the cumulative cleanup materials usage rate, in gallons; and

e. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month cleanup material usage rate, in gallons.

f. the VOC content of each cleanup material, as applied, in pounds per gallon;

g. the VOC emission rate for each cleanup material employed [d)(2)b. x d)(2)f.], in pounds;

h. the total VOC emission rate for all the cleanup materials employed [summation of d)(2)g. for all coatings.], in pounds or tons;

i. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;

j. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

(3) The permittee shall collect and record the following information each month for the peelable booth coating employed for emissions units R001, R002, R004 and K001, combined:

a. the name and identification number of each peelablebooth coating employed;

b. the number of gallons of each peelable booth coating employed;

c. the total number of gallons of all the peelable booth coatings employed [summation of d)(3)b. for all coatings];

d. for the first 12 months of operation, following the issuance of this permit, the cumulative peelable booth coatings usage rate, in gallons; and

e. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month peelable booth coatings usage rate, in gallons.

f. the VOC content of each peelable booth coating, as applied, in pounds per gallon;

g. the VOC emission rate for each peelable booth coating employed [d)(3)b. x d)(3)f.], in pounds;

h. the total VOC emission rate for all of the peelable booth coatings employed [summation of d)(3)g. for all coatings.], in pounds or tons;

i. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons; and

j. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

(4) The permittee shall collect and record the following HAP information each month for emissions units R001, R002, R004, K001 and K002, combined:

a. the company identification of each coating and cleanup material employed;

b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;

c. the number of gallons of each coating and cleanup material employed;

d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(4)b. x d)(4)c.] for each individual HAP, in lbs;

e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed for each individual HAP, the summation of d)(4)d. for all coatings and cleanup materials], in lbs;

f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed [summation of d)(4)e. for all HAPs for all coatings and cleanup materials], in lbs; and

g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

(5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

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

(7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

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

(10) The FEPTIO application for these emissions units, R001, R002, R004, K001 and K002, 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 these emissions units 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(s), (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(s), 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 x 8/X x 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: xylene w/ option* to list all toxics, covered under the worst-case toxic modeled.

   TLV (mg/m3): 434 (*for which toxic, if using worst case)

   Maximum Hourly Emission Rate (lbs/hr): 7.46 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 286.54

MAGLC (ug/m3): 10,333

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: toluene w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 188 (*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 8.28 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 134

MAGLC (ug/m3): 4476

The permittee, has demonstrated that emissions of xylene and toluene, from emissions units R001, R002, R004, K001 and K002, are 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).

(11) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), 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(s) 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.

(12) 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.

(13) 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.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the rolling, 12-momth VOC emission limitation of 52.50 tons per year , from the coatingoperations for emissions units R001, R002, R004**,** and K001, combined;

ii. all exceedances of the rolling, 12-momth VOC emission limitation of 3.57 tons VOC per year , from the peelable booth coatings for emissions units R001, R002, R004 and K001, combined;

iii. all exceedances of the rolling, 12-momth VOC emission limitation of 14.83 tons VOC per year , from the cleanup operationsfor emissions units R001, R002, R004 and K001, combined;

iv. all exceedances of rolling, 12-momth VOC emission limitations of the 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs for emissions units R001, R002, R004, K001 and K002,combined;

v. all exceedances of the rolling, 12-month restrictions on coatings usage for emissions units R001, R002, R004 and K001, combined, and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels;

vi. all exceedances of the rolling, 12-month restrictions on peelable booth coatings usage for emissions units R001, R002, R004 and K001, combined, and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative peelable booth coatings usage levels; and

vii. all exceedances of the rolling, 12-month restriction on cleanup material usage for emissions units R001, R002, R004 and K001, combined, and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative cleanup material usage 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.

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit.

The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(4) The permittee shall 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.

(5) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any monthly record showing the use of non-complying coatings [coatings that exceed 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents]. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the exceedance occurs.

f) Testing Requirements

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

a. Emission Limitations:

K001: 59.15 lbs VOC/hr, from coating operations
R001: 35.83 lbs VOC/hr, from coating operations
R002: 44.51 lbs VOC/hr, from coating operations
R004: 54.20 lbs VOC/hr, from coating operations

Applicable Compliance Method:
The hourly VOC emission limitations above represent the potentials to emit* for these emission units; therefore, no hourly monitoring, recordkeeping, or reporting requirements are required.
*The potential to emit shall be determined by multiplying the maximum hourly coating gallons usage for each emissions unit by a maximum VOC content of 3.5 lb/gal.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission imitations above in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

b. Emission Limitation:

52.50 tons of VOC per rolling,12-month period from the coatingoperations for emissions units R001, R002, R004**,** and K001, combined

Applicable Compliance Method:
Compliance with the rolling, 12-month VOC emission limitation above shall be based upon the record keeping requirements specified in section d)(1) of this permit.

c. Emission Limitation:

Annual HAP emissions from R001, R002, R004, K001 and K002, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPS.

Applicable Compliance Method:

Compliance with the rolling, 12-monthHAP emission limitations above shall be based upon the record keeping requirements specified in section d)(3) of this permit.

d. Emission Limitation:

2696 lbs VOC/month from the cleanup operations from each emissions unit individually

Applicable Compliance Method:

The monthly VOC emission limitation above represents the potential to emit* for these emission units; therefore, no hourly monitoring, recordkeeping, or reporting requirements are required.
*The potential to emit shall be determined by multiplying the maximum monthly coating gallons usage of for each emissions unit by a maximum VOC content of 6.74 lb/gal.

If required, the permittee shall demonstrate compliance with the monthly allowable VOC emission imitations above in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

e. Emission Limitation:

14.83 tons VOC per rolling, 12-month period, from the cleanup operations for emissions units R001, R002, R004 and K001, combined

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation above shall be based upon the recordkeeping requirements in section d)(2) of this permit.

f. Emission Limitation:

5.95 lbs VOC/hr for peelable booth coating for each emissions unit individually

Applicable Compliance Method:

The hourly peelable booth coating emission limitation above represents the potential to emit* for these emissions units, therefore, no hourly monitoring, recordkeeping or reporting requirements are required.

*The potential to emit shall be determined by multiplying the maximum hourly peelable booth coating gallons usage for emissions units R001, R002, R004 and K001, combined by a maximum VOC content of 5.95 lb/gal.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A, as appropriate.

g. Emission Limitation:

3.57 tons per rolling, 12-month period for peelable booth coating for emissions units R001, R002, R004 and K001, combined

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation above shall be based upon the record keeping requirements in section d)(3) of this permit.

h. Emission Limitation:

3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation shall be based upon the recordkeeping requirements in section d)(1) of this permit.

i. Emission Limitation:

The maximum annual coatings usage rate for emissions units R001, R002, R004 and K001, combined, shall not exceed 30,000 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rate.

Applicable Compliance Method:

Compliance with the rolling, 12-month coating usage restriction above shall be based upon the record keeping requirements specified in section d)(1) of this permit.

j. Emission Limitation:

The maximum annual peelable booth coatings usage rate for emissions units R001, R002, R004 and K001, combined, shall not exceed 1200 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rates.

Applicable Compliance Method:
Compliance with the rolling 12-month peelable booth coating usage restriction above shall be based upon the record keeping requirements specified in section d)(3) of this permit.

k. Emission Limitation:

The maximum cleanup materials usage rate for emissions units R001, R002, R004 and K001, combined, shall not exceed 4400 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rates.

Applicable Compliance Method:

Compliance with the rolling, 12-month cleanup materials usage restriction above shall be based upon the record keeping requirements specified in section d)(2) of this permit.

g) Miscellaneous Requirements

(1) None.