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

Certified Mail

2/27/2012

JIM CRAFT
DIAMOND POWER INTERNATIONAL INC
2600 E MAIN ST
LANCASTER, OH 43130

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

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0123010022
Permit Number: P0082428
Permit Type: Renewal
County: Fairfield

Dear Permit Holder:

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

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

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

If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-CDO

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
DIAMOND POWER INTERNATIONAL INC

Facility ID:	0123010022
Permit Number:	P0082428
Permit Type:	Renewal
Issued:	2/27/2012
Effective:	2/27/2012
Expiration:	2/27/2022

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
DIAMOND POWER INTERNATIONAL INC

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Authorization

Facility ID: 0123010022
Application Number(s): A0012726, A0012727
Permit Number: P0082428
Permit Description: FEPTIO renewal for four paint spray booths.
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 2/27/2012
Effective Date: 2/27/2012
Expiration Date: 2/27/2022
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

DIAMOND POWER INTERNATIONAL INC
2600 E MAIN ST
LANCASTER, OH 43130

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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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: P0082428
Permit Description: FEPTIO renewal for four paint spray booths.

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

Group Name: Paint Spray Booths

Emissions Unit ID:	**K001**
Company Equipment ID:	Spray Paint Booth (Machine #798-799)
Superseded Permit Number:	01-12082
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Spray Paint Booth (Machine #734)
Superseded Permit Number:	01-12082
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K004**
Company Equipment ID:	Spray Paint Booth #4
Superseded Permit Number:	01-12082
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K006**
Company Equipment ID:	2006 Spray Booth
Superseded Permit Number:	01-12082
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, Central 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.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Paint Spray Booths: K001,K002,K004,K006,

EU ID	Operations, Property and/or Equipment Description
K001	1949 Paint Booth
K002	1979 Paint Booth
K004	ASH Paint Booth
K006	2006 Paint Booth

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)(11), d)(12), and d)(13).

(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)f., c)(3) and c)(4), d)(7) through d)(10), e)(3) and f)(1)c. and f)(1)d.

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 3745-17-11(C)	See c)(1) and (2) and d(1) through d)(5).
b.	OAC rule 3745-21-09(U)(1)(c)	Volatile organic compound (VOC) emissions shall not exceed 3.5 pounds per gallon (lbs/gal) of coating, excluding water and exemptsolvents, as determined on a daily volume weighted averagebasis.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions (PE) shall not exceed 0.551 pound per hour (lb/hr) and 2.41 tons per year (tpy). See b)(2)c.
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)d.
e.	OAC rule 3745-31-05(A)(3)	Volatile organic compound(VOC) emissions from all coatingsand cleanup materials employed in this emissions unit shall notexceed 11.5 lbs/hr.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule include compliance with therequirements of OAC rules 3745-21-09(U), 3745-17-11(C), 3745-31-05(D). See b)(2)a.
f.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid MACT and Title V)	VOC emissions from all coatingsand cleanup materials employed in emissions units K001, K002,K004, and K006 shall not exceed 46.22 tons per rolling,12-month period. Individual HAP emissions from all coatings and cleanup materialsemployed in emissions units K001, K002, K004, and K006shall not exceed 9.9 tons per rolling, 12-month period. Combined HAP emissions from all coatings and cleanup materialsemployed in emissions units K001, K002, K004, and K006shall not exceed 24.5 tons per rolling, 12-month period.
g.	ORC 3704.03(F)(4)(c) (Toxic Air Contaminants)	See d)(11), (12), and (13).

(2) Additional Terms and Conditions

a. The VOC content of each thinner and clean up material, as applied, shall not exceed 8.0 pounds of VOC per gallon, minus water and exempt solvents.

b. The following spray guns may be used in these spray booths: air gun, airless, air assisted airless, high volume low pressure(HVLP), or any application method that achieves a transfer efficiencyof at least 75 percent. However, only one per booth is permitted to be in use at any given time.

c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy

BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply:

b)(1)c. and f)(1)b.

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE emissions from this emissions unit because controlled (through dry filtration) PE emissions are less than ten tons per year.

c) Operational Restrictions

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

[OAC rule 3745-17-11(C)(1) and (2)(b)]

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

[OAC rule 3745-17-11(C)(2)(e)]

(3) This emissions unit has been in operation for more than 12 months and, as such, thepermittee has existing records to generate the rolling, 12-month summation of thecoating usage, upon issuance of this permit. The maximum amount of annual coatingusage for emissions units K001, K002, K004, and K006 shall not exceed 25,269gallons, based upon a rolling, 12-month summation of coating usage figures.

(4) This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the thinner and cleanup material usage, upon issuance of this permit. The maximum annual cleanup material usage for emissions units K001, K002, K004, and K006 shall not exceed 500 gallons, based upon a rolling, 12-month summation of usage figures. [Note: Solvents used as thinners in coating formulation are accounted for in Section c)(3)ofthis permit.]

d) Monitoring and/or Recordkeeping Requirements

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

[OAC 3745-17-11(C)(2)(a)]

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

[OAC rule 3745-17-11(C)(2)(c)]

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

[OAC rule 3745-17-11(C)(2)(c)]

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

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

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

[OAC rule 3745-17-11(C)(2)(d) and (f)]

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

[OAC rule 3745-17-11(C)(2)(e),(f), and (g)], for [OAC rule 3745-17-11(C)(1)]

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

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

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

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

d. the total number of hours the emissions unit was in operation;

e. the total VOC emission rate for all coatings and cleanup materials, in pounds per day; and

f. the average hourly VOC emission rate for all coatings and cleanup materials.

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

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

b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and

c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.

(8) The permittee shall collect and record the following information each month:

a. the name and identification of each material employed by emissions units K001, K002, K004, and K006;

b. the VOC content for each material employed by emissions units K001, K002, K004, and K006, in pounds per gallon, excluding water and exempt solvents, as applied;

c. the number of gallons applied, of each material employed by emissions units K001, K002, K004, and K006;

d. the rolling, 12-month summation of the material usage for emissions units K001, K002, K004, and K006, in gallons; and

e. the total VOC emissions from all materials employed by emissions units K001, K002, K004, and K006, in tons per rolling, 12-month period.

(9) The permittee shall collect and record the following information for emissions units K001, K002, K004, and K006 on a monthly basis:

a. the name and identification of each coating, thinner, and cleanup material employed;

b. the individual HAP content of each coating, thinner, and cleanup material, in lbs/gallon;

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

d. the total emissions of each individual HAP from all coatings, thinners and cleanup materials employed, in lbs or tons; and

e. the total combined HAP emissions from all coatings, thinners, and cleanup materials employed, in lbs or tons.

(10) The permittee shall collect and record the following information on a monthly basis for emissions units K001, K002, K004, and K006 for the purpose of determining compliance with the rolling, 12-month emission limitations:

a. the rolling, 12-month summation of individual HAP emissions from all coatings, thinners, and cleanup materials, in lbs or tons; and

b. the rolling, 12-month summation of total combined HAP emissions from all coatings, thinners, and cleanup materials, in lbs or tons.

(11) The permit-to-install for emissions units K001, K002, K004, and K006 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the ISC-PRIME model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the ISC-PRIME (or other approved) model, was compared to the MaximumAcceptable Ground-Level Concentration (MAGLC), and calculated as required inEngineering Guide #70. The following summarizes the results of the modeling for the"worst case" pollutant(s):

Pollutant: **Xylene**
TLV (mg/m3): **434**
Maximum Hourly Emission Rate (lbs/hr): **7.25**
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):**69**
MAGLC (ug/m3): **10,339**

Pollutant: **Toluene**
TLV (mg/m3): **188**
Maximum Hourly Emission Rate (lbs/hr): **8.24**
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):**69**
MAGLC (ug/m3): **4,486**

Pollutant: **Ethyl Benzene**
TLV (mg/m3): **434**
Maximum Hourly Emission Rate (lbs/hr): **2.17**
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):**23**
MAGLC (ug/m3): **10,338**

Pollutant: **MIBK**
TLV (mg/m3): **205**
Maximum Hourly Emission Rate (lbs/hr): **1.83**
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):**19**
MAGLC (ug/m3): **4,887**

Pollutant: **Aliphatic Hydrocarbon**
TLV (mg/m3): **1,399**
Maximum Hourly Emission Rate (lbs/hr): **7.41**
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):**79**

MAGLC (ug/m3): **33,304**

Pollutant: **Stoddard Solvent**
TLV (mg/m3): **572**
Maximum Hourly Emission Rate (lbs/hr): **12.21**
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):**130**
MAGLC (ug/m3): **13,633**

Pollutant: **Ethyl Acetate**
TLV (mg/m3): **1,440**
Maximum Hourly Emission Rate (lbs/hr): **11.08**
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):**118**
MAGLC (ug/m3): **34,317**

Pollutant: **Isopropanol**
TLV (mg/m3): **490**
Maximum Hourly Emission Rate (lbs/hr): **1.71**
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):**26**
MAGLC (ug/m3): **11,703**

Pollutant: **Methyl Propyl Ketone**
TLV (mg/m3): **705**
Maximum Hourly Emission Rate (lbs/hr): **2.74**
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):**26**
MAGLC (ug/m3): **16,783**

(12) 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

(13) 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

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 notify the Ohio EPA, Central District Office in writing of any daily record showing the use of noncomplying coatings (i.e., an exceedance of 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, as determined on a daily volume weighted average basis). The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

(3) 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. the rolling, 12-month coating usage limitation (25,269 gallons);

ii. the rolling, 12-month thinner and cleanup material usage limitation (500 gallons);

iii. the rolling, 12-month VOC emission limitation (46.22 tons);

iv. the rolling, 12-month individual HAP emission limitation (9.9 tons); and

v. the rolling, 12-month total combined HAP emission limitation (24.5 tons).

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, thepermittee 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).

[OAC rule 3745-15-03(B)(1)(b)]and [OAC rule 3745-15-03(C)]

(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.

[OAC rule 3745-15-03(B)(2)] and [OAC rule 3745-15-03(D)]

f) Testing Requirements

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

a. <u>Emission Limitation</u>

VOC emissions shall not exceed 3.5 lbs VOC/gal of coating, excluding water and exempt solvents, as determined on a daily volume weighted average basis

Applicable Compliance Method

Compliance with this emission limitation shall be based upon the records required pursuant to Section d)(7)c. U.S. EPA Method 24 shall be used to determine the VOC contents for the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

b. Emissions Limitation

PE shall not exceed 0.551 lb PE/hr and 2.41 tpy.

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

c. Emission Limitation

VOC emissions from all coatings and cleanup materials employed in emissions units K001, K002, K004, and K006 shall not exceed 46.22 tons/rolling, 12-month period

Applicable Compliance Method

Compliance with this VOC emission limitation shall be demonstrated through the monthly records required in Section d)(8)e. above.

d. Emission Limitations

Combined HAP emissions from all coatings, thinners, and cleanup materials employed in emissions units K001, K002, K004, and K006 shall not exceed 24.5 tons/rolling, 12-month period.

Individual HAP emissions from all coatings, thinners, and cleanup materials employed in emissions units K001, K002, K004, and K006 shall not exceed 9.9 tons/rolling, 12-month period.

Applicable Compliance Method

Compliance with these HAP emission limitations shall be demonstrated through the monthly records required in Sections d)(10)a. and d)(10)b. above.

e. Emission Limitation

The VOC content of each thinner and clean up material, as applied, shall not exceed 8.0 lbs VOC/gal, minus water and exempt solvents.

Applicable Compliance Method

Compliance with this emission limitation shall be based upon the records required pursuant to Section d)(6)c. U.S. EPA Method 24 shall be used to determine the VOC contents for the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

f. Emission Limitation

VOC emissions from all coatings and cleanup materials employed in this emissions unit shall not exceed 11.5 lbs/hr.

Applicable Compliance Method

Compliance with this VOC emission limitation shall be demonstrated through the monthly records required in Section d)(6)f. above.

g) Miscellaneous Requirements

(1) None.