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

Certified Mail

3/1/2012

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

Ms. Cheryl Arkenberg
Elite Enclosure Company
2349 industrial Dr.
Sidney, OH 45066

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

Facility ID: 0575015006
Permit Number: P0109500
Permit Type: Initial Installation
County: Shelby

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, Sidney Daily News. 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, Southwest District Office
401 East Fifth Street
Dayton, OH 45402

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, Southwest District Office at (937)285-6357.

Sincerely,

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

Cc: U.S. EPA Region 5*Via E-Mail Notification*
Ohio EPA-SWDO; Indiana

Permit Strategy Write-Up

1. Check all that apply:

   _X_Synthetic Minor Determination (Federally Enforceable HAP(s) limits to avoid Title V and 40 CFR Part 63 Subpart MMMM, requirements)

2. Source Description:

   This permit is to address the installation of 2 miscellaneous metal coating booths, emissions unit K001 and K002, at Elite Enclosures new Sidney, Ohio's facility. This is basically, a relocating of Elite's Fort Loramie operations, 057501235, to a new location in Sidney, Ohio. Once the operations are relocated to the new Sidney, Ohio, location, the existing FEPTIO, P0088919, which was issued final on Sept. 5, 2008, will be revoked and the Fort Loramie facility profile, shutdown.

3. Facility Emissions and Attainment Status:

   The new facility, like the existing facility, will be a synthetic minor for Title V and 40 CFR Part 63 Subpart MMMM requirements. It will be located in Shelby County, which is attainment for all regulated pollutants.

4. Source Emissions:

   This permit includes the following emissions units K001 and K002.

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

Pollutant	Tons Per Year
VOC	24.8
PE	0.64
Individual HAP	9.9
Combined HAP's	24.9

PUBLIC NOTICE
3/1/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

Elite Enclosure Company
2349 Industrial Dr.,
Sidney, OH 45365
Shelby County
FACILITY DESC.: All Other Miscellaneous Fabricated Metal Product Manufacturing
PERMIT #: P0109500
PERMIT TYPE: Initial Installation
PERMIT DESC: Installation of two miscellaneous metal coating booths w/ federally enforceable limits to avoid Title V and 40 CFR Part 63 Subpart MMMM, Miscellaneous Metal coating MACT requirements

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: Craig Osborne, Ohio EPA DAPC, Southwest District Office, 401 East Fifth Street, Dayton, OH 45402. Ph: (937)285-6357

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Elite Enclosure Company

Facility ID:	0575015006
Permit Number:	P0109500
Permit Type:	Initial Installation
Issued:	3/1/2012
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
Elite Enclosure Company

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Authorization

Facility ID: 0575015006
Application Number(s): A0043804
Permit Number: P0109500
Permit Description: Installation of two miscellaneous metal coating booths w/ federally enforceable limits to avoid Title V and 40 CFR Part 63 Subpart MMMM, Miscellaneous Metal coating MACT requirements
Permit Type: Initial Installation
Permit Fee: $400.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 3/1/2012
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:

Elite Enclosure Company
2349 Industrial Dr.
Sidney, OH 45365

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, Southwest District Office
401 East Fifth Street
Dayton, OH 45402
(937)285-6357

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: P0109500
Permit Description: Installation of two miscellaneous metal coating booths w/ federally enforceable limits to avoid Title V and 40 CFR Part 63 Subpart MMMM, Miscellaneous Metal coating MACT requirements

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

Emissions Unit ID:	**K001**
Company Equipment ID:	Electrostatic Paint Booth 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Electrostatic Paint Booth #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Southwest 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) Sections B2., 3., and 4., below.

2. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons per year (TPY) for any individual HAP and 24.9 TPY for the combination of all HAPs, based upon rolling, 12-month summations.

3. The permittee shall collect and record the following information each month for this facility, including emission units K001 and K002:

   a) the company identification for each HAP-emitting material (i.e., all HAP-containing coatings, clean-up materials, resins, adhesives, potting compounds, plating chemicals, etc.);

   b) the individual HAP content of each HAP emitting material;

   c) the total combined HAP content of each HAP emitting material (i.e. sum of individual HAP contents from b);

   d) the amount of each HAP emitting material employed during the previous calendar month;

   e) the hours of operation, or other emissions determining rationale, of all HAP-generating sources;

   f) the total individual HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in pounds or tons per month;

   g) the total combined HAP emissions from all HAP emitting materials employed and all HAP-generating sources, in pounds or tons per month;

   h) the rolling, 12-month summation of individual HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in tons; and

   i) the rolling, 12-month summation of total combined HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in tons.

4. The permittee shall submit quarterly deviation (excursion) reports for the following emissions unit(s) 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:

b) The rolling 12 individual HAP emissions is equal to or greater than 9.9 tons from this facility; and

c) The rolling 12 month combined HAP's emissions are equal to or greater than 24.9 tons from this facility.

d) the probable cause of each deviation (excursion);

e) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

f) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

5. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart *XXXXXX (6X)*, National Emission Standards for Hazardous Air Pollutants (NESHAP) forNine Metal Fabrication and Finishing Area Source Categories. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: http://www.epa.gov/ttn/atw/area/arearules.html**.**

C. Emissions Unit Terms and Conditions

1. K001, Electrostatic Paint Booth 1

Operations, Property and/or Equipment Description:

Electrostatic spray painting of fabricated metal parts booth 1

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

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

a. b)(1)e, d)(3), d)(4), d)(5), d)(6), and e)(4), below.

(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) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	Volatile organic compound (VOC) emissions shall not exceed 61.0 pounds per day from coatings.
b.	OAC rule 3745-31-05 (D) Synthetic Minor Restriction to Avoid Title V	Volatile organic compound (VOC) emissions shall not exceed 12.4 tons per rolling 12 month period, including both coatings and cleanup materials.
c.	OAC rule 3745-21-09(U)(2)(e)	Daily coating usage limitation.
d.	OAC rule 3745-17-11(C)	Use of a overspray control system..
e.	OAC rule 3745-114-01	Ohio Air Toxics Rule

(2) Additional Terms and Conditions

a. The permittee shall operate a dry particulate filter for this coating operation in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The dry filter system shall be employed during all periods of coating application to control particulate emissions.

c) Operational Restrictions

(1) The coatings usage in this emissions unit shall not exceed 10 gallons per day.

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, as applied (including added thinners);

b. The number of gallons of each coating employed, as applied;

c. The total coatings usage, in gallons, from all the coatings, as applied [summation of “b” for all coatings];

d. The VOC content of the coatings employed, in pounds per gallon, as applied; and

e. The daily VOC emissions, in pounds of VOC, {summation of “c” x “d”].

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

a. The name and identification number of each coating, thinner, and liquid organic cleanup material employed;

b. The number of gallons of each coating, thinner, and liquid organic cleanup material employed;

c. The VOC content of each coating, thinner, and liquid organic cleanup material employed, in pounds of volatile organic compound (VOC) per gallon;

d. The VOC emissions of each coating, thinner, and liquid organic cleanup material employed, in pounds and/or tons;

e. The total VOC emissions from the coating, thinner, and liquid organic cleanup material employed, in tons per month, [the summation of “d”]; and

f. the rolling 12 month total VOC emissions, calculated using the summation of “e” plus the previous 11 months, in tons per rolling 12 month period.

(3) The federally enforceable permit-to-install and operate (FEPTIO) application for this emissions unit 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. 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): 434.2 (*for which toxic, if using worst case)

   Maximum Hourly Emission Rate (lbs/hr): 5.2 (*for which toxic, if using worst case)

   Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 4.65

   MAGLC (mg/m3): 43.42

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

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

(4) 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 PTI, PTIO, or FEPTIO (as applicable) 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

(5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

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

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

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

(7) The owner or operator shall conduct periodic inspections at a frequency that is based upon the recommendation of the manufacturer of the panel filter system, or at least once each calendar year, whichever is comes first. The inspection shall determine whether the filter system is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator.

The owner or operator shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the panel filter system with any modifications deemed necessary by the owner or operator during the time period in which the control devices are utilized.

The owner or operator shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.

These documents shall be maintained for not less than five years and made available to Ohio EPA upon request.

(8) In the event that the dry filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The owner or operator shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.

These documents shall be maintained for not less than five years and made available to Ohio EPA upon request.

e) Reporting Requirements

(1) The permittee shall notify the Director any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. A copy of such record shall be sent to the director within forty-five days after the exceedance occurs.

[OAC rule 3745-21-09(B)(3)(e)]

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

a. all exceedances of the 61.0 pounds of VOC emissions per day limitation, from the coatings employed**;** and

b. allexceedances of the 12.4 tons of VOC per rolling 12-month period limitation, including both coatings and cleanup materials..

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[ORC 3704.03(T); OAC rule 3745-31-05(D)]

(3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(4) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting 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. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

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

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. Operational Limitation:

10 gallons of coatings per day

Applicable Compliance Method:

Compliance with the gallon usage restriction above shall be based on the record keeping requirements established in section d) of this permit.

b. Emission Limitations:

61.0 lbs VOC/day

The above limitation is based on the following equation:

DER = Cu x VOC

Where:

DER = Daily Emission Rate, in pounds of VOC per day;

Cu = Coating usage, in gallons per day, (10 gallons, from OAC rule 3745-21-09(U)(2)(e));

VOC = Volatile organic compound (VOC) in pounds per gallon of coating, as applied, (including all additives and/or thinners), (6.1, from company's calculation sheet).

Applicable Compliance Method:

Compliance with the gallon usage restriction above shall be based on the record keeping requirements established in section d) of this permit.

c. Emission Limitations:

12.4 tons of VOC per rolling 12 month period.

The above limitation is based on the following equation:

AER = [(Cu x VOC) + (Cl x Clvoc)]/2000

Where:

AER = Annual Emission Rate, in tons of VOC per rolling 12 month period;

Cu = Coating usage, in gallons per year, (3650 gallons);

VOC = Volatile organic compound (VOC) in pounds per gallon of coating, as applied, (including all additives and/or thinners), (6.1, from company's calculation sheet);

Cl = Cleanup usage, in gallons per year, (30 gallons per month x 12 months per year = 360 gallons of liquid organic cleanup employed per year, EAC forms page 4); and

Clvoc = Volatile organic compound (VOC) in pounds per gallon of liquid organic cleanup material employed, (Xylene, 7.25 pounds per gallon density).

Applicable Compliance Method:

Compliance with the gallon usage restriction above shall be based on the record keeping requirements established in section d) of this permit.

(2) Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials.

g) Miscellaneous Requirements

(1) None.

2. K002, Electrostatic Paint Booth #2

Operations, Property and/or Equipment Description:

Electrostatic spray painting of fabricated metal parts booth 2

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

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

a. b)(1)e, d)(3), d)(4), d)(5), d)(6), and e)(4), below.

(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) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	Volatile organic compound (VOC) emissions shall not exceed 61.0 pounds per day from coatings
b.	OAC rule 3745-31-05 (D) Synthetic Minor Restriction to Avoid Title V	Volatile organic compound (VOC) emissions shall not exceed 12.4 tons per rolling 12 month period, including both coatings and cleanup materials.
c.	OAC rule 3745-21-09(U)(2)(e)	Daily coating usage limitation.
d.	OAC rule 3745-17-11(C)	Use of a overspray control system..
e.	OAC rule 3745-114-01	Ohio Toxic Rule

(2) Additional Terms and Conditions

a. The permittee shall operate a dry particulate filter for this coating operation in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The dry filter system shall be employed during all periods of coating application to control particulate emissions.

c) Operational Restrictions

(1) The coatings usage in this emissions unit shall not exceed 10 gallons per day.

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, as applied (including added thinners);

b. The number of gallons of each coating employed, as applied;

c. The total coatings usage, in gallons, from all the coatings, as applied [summation of “b” for all coatings];

d. The VOC content of the coatings employed, in pounds per gallon, as applied; and

e. The daily VOC emissions, in pounds of VOC, {summation of “c” x “d”].

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

a. The name and identification number of each coating, thinner, and liquid organic cleanup material employed;

b. The number of gallons of each coating, thinner, and liquid organic cleanup material employed;

c. The VOC content of each coating, thinner, and liquid organic cleanup material employed, in pounds of volatile organic compound (VOC) per gallon;

d. The VOC emissions of each coating, thinner, and liquid organic cleanup material employed, in pounds and/or tons;

e. The total VOC emissions from the coating, thinner, and liquid organic cleanup material employed, in tons per month, [the summation of “d”]; and

f. the rolling 12 month total VOC emissions, calculated using the summation of “e” plus the previous 11 months, in tons per rolling 12 month period.

(3) The federally enforceable permit-to-install and operate (FEPTIO) application for this emissions unit 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. 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): 434.2 (*for which toxic, if using worst case)

   Maximum Hourly Emission Rate (lbs/hr): 5.2 (*for which toxic, if using worst case)

   Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 4.65

   MAGLC (mg/m3): 43.42

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

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

(4) 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 PTI, PTIO, or FEPTIO (as applicable) 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

(5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

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

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

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

(7) The owner or operator shall conduct periodic inspections at a frequency that is based upon the recommendation of the manufacturer of the panel filter system, or at least once each calendar year, whichever is comes first. The inspection shall determine whether the filter system is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator.

The owner or operator shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the panel filter system with any modifications deemed necessary by the owner or operator during the time period in which the control devices are utilized.

The owner or operator shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.

These documents shall be maintained for not less than five years and made available to Ohio EPA upon request.

(8) In the event that the dry filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The owner or operator shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.

These documents shall be maintained for not less than five years and made available to Ohio EPA upon request.

e) Reporting Requirements

(1) The permittee shall notify the Director any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. A copy of such record shall be sent to the director within forty-five days after the exceedance occurs.

[OAC rule 3745-21-09(B)(3)(e)]

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

a. all exceedances of the 61.0 pounds of VOC emissions per day limitation, from the coatings employed**;** and

b. allexceedances of the 12.4 tons of VOC per rolling 12-month period limitation, including both coatings and cleanup materials..

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[ORC 3704.03(T), OAC rule 3745-31-05(D)]

(3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(4) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting 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. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

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

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. Operational Limitation:

10 gallons of coatings per day

Applicable Compliance Method:

Compliance with the gallon usage restriction above shall be based on the record keeping requirements established in section d) of this permit.

b. Emission Limitations:

61.0 lbs VOC/day

The above limitation is based on the following equation:

DER = Cu x VOC

Where:

DER = Daily Emission Rate, in pounds of VOC per day;

Cu = Coating usage, in gallons per day, (10 gallons, from OAC rule 3745-21-09(U)(2)(e));

VOC = Volatile organic compound (VOC) in pounds per gallon of coating, as applied, (including all additives and/or thinners), (6.1, from company's calculation sheet).

Applicable Compliance Method:

Compliance with the gallon usage restriction above shall be based on the record keeping requirements established in section d) of this permit.

c. Emission Limitations:

12.4 tons of VOC per rolling 12 month period.

The above limitation is based on the following equation:

AER = [(Cu x VOC) + (Cl x Clvoc)]/2000

Where:

AER = Annual Emission Rate, in tons of VOC per rolling 12 month period;

Cu = Coating usage, in gallons per year, (3650 gallons);

VOC = Volatile organic compound (VOC) in pounds per gallon of coating, as applied, (including all additives and/or thinners), (6.1, from company's calculation sheet);

Cl = Cleanup usage, in gallons per year, (30 gallons per month x 12 months per year = 360 gallons of liquid organic cleanup employed per year, EAC forms page 4); and

Clvoc = Volatile organic compound (VOC) in pounds per gallon of liquid organic cleanup material employed, (Xylene, 7.25 pounds per gallon density).

Applicable Compliance Method:

Compliance with the gallon usage restriction above shall be based on the record keeping requirements established in section d) of this permit.

(2) Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings and cleanup materials.

g) Miscellaneous Requirements

(1) None.