



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
ALLEN COUNTY**

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 03-17347

Fac ID: 0302020027

DATE: 10/30/2007

Joint Systems Manufacturing Center
Cletus Hoersten
1155 Buckeye Road
Lima, OH 45804-1825

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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 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

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 10/30/2007
Effective Date: 10/30/2007**

FINAL PERMIT TO INSTALL 03-17347

Application Number: 03-17347
Facility ID: 0302020027
Permit Fee: **\$200**
Name of Facility: Joint Systems Manufacturing Center
Person to Contact: Cletus Hoersten
Address: 1155 Buckeye Road
Lima, OH 45804-1825

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1155 Buckeye Road
Shawnee Township, Ohio**

Description of proposed emissions unit(s):
EFV and Cougar Paint Line.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

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the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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12. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder.

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The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

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If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit-To-Install Summary of Allowable Emissions

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	58.18
VOC	40.52
PM10	0.40

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment - (K006) - Expeditionary Fighting Vehicle and Cougar Paint Line with Dry Filtration

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	172.02 pounds of organic compounds (OC) per hour; 58.18 tons of OC per year for wash solvent, coating and cleanup operations (see A.I.2.e)
OAC rule 3745-31-05(C)	40.52 tons of VOC per rolling 12-month period for wash solvent, coating and cleanup operations (see A.I.2.b) 0.40 ton of particulate matter 10 microns or less in size (PM10) per rolling 12-month period (see A.I.2.b)
ORC 3704.03(T)(4)	See A.I.2.a
OAC rule 3745-21-09(U)(1)(c)	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (see A.I.2.c)
OAC rule 3745-17-11(B)	0.551 pound of particulate emissions (PE) per hour (see A.I.2.d)
OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to particulate emissions (PE) from this air contaminant source since the calculated annual emission rate for PE is less than ten tons per year taking into account the federally enforceable rule limit of 0.551 pounds PE per hour from each coating booth operation under OAC rule 3745-17-11(B). All emissions of particulate matter are PM10 and, therefore, BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to PM10 or PE.
- 2.b This permit establishes the following federally enforceable emission limitations based on material usage restrictions for emissions unit K006 (see A.II.1 and A.II.2):

Emissions Unit ID: K006

- i. 40.52 tons of VOC per rolling 12-month period
 - ii. 0.40 tons of PM10 per rolling 12-month period
- 2.c** The VOC content, excluding water and exempt solvents, restriction as contained in 3745-21-09(U)(1)(c) applies to all coatings employed in emissions unit K006.
- 2.d** The emission limitation of 0.551 pound PE per hour is applicable to each individual coating operation:
- i. 0.551 pound of PE per hour from prime booth operations;
 - ii. 0.551 pound of PE per hour from topcoat-exterior booth operations; and
 - iii. 0.551 pound of PE per hour from topcoat-interior booth operations.
- 2.e** The OC emission limitations involve organic compounds which do not participate in atmospheric photochemical reactions and, therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).
- 2.f** The hourly OC emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

II. Operational Restrictions

1. The maximum rolling 12-month quantity of materials containing VOC (wash solvent, coatings, cleanup materials, etc.) employed in emissions unit K006 shall be limited by the following equation:

$$M = \sum_{i=1}^n [(V_i \times G_i)] \div 2000 \text{ lbs/ton} \leq 40.52$$

where,

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

V_i = VOC content in pounds per gallon of each material containing VOC (wash solvent, coatings, cleanup materials, etc.) employed

G_i = gallons of each material containing VOC (wash solvent, coatings, cleanup materials, etc.) used during the rolling 12 month period

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n = total number of materials containing VOC (wash solvent, coatings, cleanup materials, etc.) employed in emissions unit K006.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material containing VOC (wash solvent, coatings, cleanup materials, etc.) employed in emissions unit K006 combined, shall not exceed the following rates:

Month	Usage of materials containing VOC shall not exceed the following as (calculated in accordance with the equation above)
1	8.00
1-2	11.00
1-3	14.00
1-4	17.00
1-5	20.00
1-6	23.00
1-7	26.00
1-8	29.00
1-9	32.00
1-10	35.00
1-11	38.00
1-12	40.52

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual restriction on the amount of materials containing VOC shall be based upon a rolling 12-month summation.

2. The maximum rolling 12-month quantity of coatings applied resulting in PM10 emissions shall be limited by the following equation:

$$\sum_{i=1}^{12} n [(V_i) D_i S_i] (1 - T_i/100)(1 - C/100) \div 2000 \text{ lbs/ton} \leq 0.40$$

M=1 i=1

where,

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

Emissions Unit ID: K006

- V_i = the volume, in gallons of each coating employed;
- D_i = Density in pounds per gallon of each coating (i.e., top coat, primer, etc.) employed
- S_i = Solids content (percent by weight) of each coating (i.e., top coat, primer, etc.)
- T_i = the percent transfer efficiency associated with each coating
- C = a control efficiency of 99% for use of dry filtration (capture efficiency = 100%)
- n = total number of coatings applied resulting in PM10 emissions (top coat, primer, etc.) employed in emissions unit K006.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of coatings applied resulting in PM10 emissions (top coat, primer, etc.) employed in emissions unit K006 combined, shall not exceed the following rates:

Month	Particulate Matter Less than 10 Microns (tons) (calculated in accordance with the equation above)
1	0.08
1-2	0.11
1-3	0.14
1-4	0.17
1-5	0.20
1-6	0.23
1-7	0.26
1-8	0.29
1-9	0.32
1-10	0.35
1-11	0.38
1-12	0.40

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual restriction on the amount of coatings applied resulting in PM10 emissions shall be based upon a rolling 12-month summation.

3. The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

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1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall maintain monthly records of the following OC/VOC information for emissions unit K006:
 - a. the name and identification number of each wash solvent, coating and cleanup material employed;
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gal [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B) (8) of OAC rule 3745-21-10 for $C_{VOC,2}$];
 - c. the VOC content of each wash solvent, coating and cleanup material employed, in pounds per gallon, as applied;
 - d. the OC content of each wash solvent, coating and cleanup material employed, in pounds per gallon, as applied;
 - e. the volume, in gallons, of each wash solvent, coating and cleanup material employed;
 - f. the total VOC emissions, in tons, from all wash solvents, coatings and cleanup materials employed, prior to any credit claimed for solvent recycling [i.e., the summation of (c x e) for all coatings and cleanup materials, divided by 2000 lbs/ton];
 - g. for the first 12 calendar months of operation under the provisions of this permit, the monthly cumulative VOC containing material usage rate, as specified in section A.II.1;
 - h. beginning the first month after the first 12 calendar months of operation under the provisions of this permit, the rolling 12-month VOC emissions, in tons, from all the wash solvents, coatings and cleanup materials employed, prior to any credit claimed for solvent recycling;
 - i. the total OC emissions, in tons, from all wash solvents, coatings and cleanup materials employed, prior to any credit claimed for solvent recycling [i.e., the summation of (d x e) for all coatings and cleanup materials, divided by 2000

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lbs/ton]; and

- j. the annual, year-to-date, OC emissions from all wash solvents, coatings and cleanup operations, in tons per year (summation of i for each calendar month to date from January to December).
3. If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling 12-month emission calculations, the permittee shall maintain the following records for the recovered materials, and the recovery drum or tank serving this emissions unit:
 - a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;
 - b. the total amount of material collected and shipped for recycling/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;
 - c. a record of the VOC content of each material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;
 - d. the mass (lbs) of VOC to be credited to the rolling 12-month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., $b \times c$), and the date of each such shipment or record of credit;
 - e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit for the materials shipped for recycling/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the rolling 12-month period; and
 - f. the rolling, 12-month of VOC emissions from the materials employed, after any credit claimed for solvent recycling.
 4. The permittee shall maintain monthly records of the following PM10 information for emissions unit K006:
 - a. the name and identification number of each coating employed;

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- b. the density of each coating employed, in pounds per gallon (D_i), as applied;
- c. the solids content of each coating employed, in percent by weight (S_i), as applied;
- d. the volume, in gallons (V_i), of each coating employed;
- e. the percent transfer efficiency (T_i) associated with each coating employed;
- f. the calculated PM10 emissions from each coating employed using the following equation:

$$\text{PM10 emissions in lbs} = (V_i)(D_i)(S_i)(1 - T_i/100)(1 - C/100)$$

C = a control efficiency of 99% for use of dry filtration
- g. the total PM10 emissions, in tons, from all coatings employed, [i.e., the summation of f for all coatings, divided by 2000 lbs/ton];
- h. for the first 12 calendar months of operation under the provisions of this permit, the monthly cumulative usage rate for coatings resulting in PM10 emissions as specified in section A.II.2; and
- i. beginning the first month after the first 12 calendar months of operation under the provisions of this permit, the rolling 12-month PM10 emissions, in tons, from all the coatings employed.

IV. Reporting Requirements

1. The permittee shall notify the Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month VOC emission limitation of 40.52 tons; and
 - b. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative usage rates of wash solvents, coatings and cleanup materials as specified in section A.II.1.
 - c. beginning the first month after the first 12 calendar months of operation under

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the provisions of this permit, all exceedances of the rolling, 12-month PM10 emission limitation of 0.40 tons; and

- d. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative usage rates of material resulting in PM10 emissions as specified in section A.II.2.

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from wash solvents, coatings and cleanup operations. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content) The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
40.52 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance with the rolling VOC emission limitation above shall be based upon the record keeping requirements specified in sections A.III.2 and A.III.3 of this permit.

- b. Emission Limitation:
3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents for an extreme performance coating.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be based upon the record keeping requirements specified in section A.III.2 for this permit.

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- c. Emission Limitation:
172.02 pounds of organic compounds (OC) per hour

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was based on the following worst case operating scenario for the paint line:

wash solvent: 0.86 lb OC/gal x 10.67 gal/hr = 9.18 lbs OC/hr

primer coating: 2.84 lbs OC/gal x 6.67 gal/hr = 18.94 lbs OC/hr

top coat (exterior): 5.18 lbs OC/gal x 4.0 gal/hr = 20.72 lbs OC/hr

top coat (interior): 5.17 lbs OC/gal x 1.77 gal/hr = 9.15 lbs OC/hr

non-skid: 2.95 lbs OC/gal x 3.67 gal/hr = 10.83 lbs OC/hr

cleanup: 6.88 lbs OC/gal x 15 gal/hr = 103.20 lbs OC/hr

$9.18 + 18.94 + 20.72 + 9.15 + 10.83 + 103.20 = 172.02$ lbs OC/hr

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

- d. Emission Limitation:
58.18 tons of OC per year for wash solvent, coating and cleanup operations

Applicable Compliance Method: Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in section A.III.2 and A.III.3 of this permit.

- e. Emission Limitation:
0.551 pound PE per hour (per individual coating operation)

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operations:

$$(V_i)(D_i)(S_i)(1 - T_i/100)(1 - C/100)$$

where,

V_i = the volume, in gallons of each coating employed;

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D_i = Density in pounds per gallon of each coating (i.e., top coat, primer, etc.) employed

S_i = Solids content (percent by weight) of each coating (i.e., top coat, primer, etc.)

T_i = the percent transfer efficiency associated with each coating

C = a control efficiency of 99% for use of dry filtration (capture efficiency = 100%)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to OAC rule 3745-17-03(B)(10).

- f. Emission Limitation:
0.40 ton of particulate matter 10 microns or less in size (PM10) per rolling 12-month period

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Applicable Compliance Method:

Compliance with the rolling PM10 emission limitation above shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

g. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the visible PE shall be determined in accordance with OAC rule 3745-17-03(B)(1).

2. Formulation data or U.S. EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the OC/VOC content of materials.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

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Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01	See B.III.1 through B.III.3
ORC 3704.03(F)	See B.III.1 through B.III.3

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The Permit to Install for this emissions unit 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 1 ton per year using the SCREEN 3.0 model or other Ohio EPA-approved model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model (or other approved model) was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst-case" pollutant(s):

Pollutant: MIBK

TLV (mg/m³): 204,826.00

Maximum Hourly Emission Rate (lbs/hr): 36.95

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Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 514.30

MAGLC (ug/m3): 4876.80

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound or chemical with a lower Threshold Limit Value (TLV) than the TLV previously modeled, as documented in the most recent version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. If the permittee determines that the "Air Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing Permit to Install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final Permit to Install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the

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"Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None