



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
TUSCARAWAS 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: 06-08240

Fac ID: 0679020185

DATE: 4/10/2007

Kimble Acquisition Company
Phil Raber
3409 Crooked Run Rd. NW
New Philadelphia, OH 44663

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, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

SEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 4/10/2007
Effective Date: 4/10/2007**

FINAL PERMIT TO INSTALL 06-08240

Application Number: 06-08240
Facility ID: 0679020185
Permit Fee: **\$1600**
Name of Facility: Kimble Acquisition Company
Person to Contact: Phil Raber
Address: 3409 Crooked Run Rd. NW
New Philadelphia, OH 44663

Location of proposed air contaminant source(s) [emissions unit(s)]:

**Reiser Ave. SE
New Philadelphia, Ohio**

Description of proposed emissions unit(s):

Three truck paint booths and two shot blast booths.

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. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install 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 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 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. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install 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.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. 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.

Kimble Acquisition Company
 PTI Application: 06-08240
 Issued: 4/10/2007

Facility ID: 0679020185

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) 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.

15. 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 this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	50.0
VOC	89.8
Individual HAP	9.9
Total HAP	18.4

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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 - (P001) - Blast booth number 1 controlled by a cartridge filter

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-17-07(A)	Visible particulate emissions from the baghouse stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 24.1 lbs/hr.
ORC 3704.03(T)(4)	PE shall not exceed 10.0 tons/yr. See A.2.a

2. Additional Terms and Conditions

- 2.a Permit to Install 06-08240 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

Cartridge filter with a design maximum outlet concentration of 0.01 gr PE/dscf.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the cartridge filter during operation of this emissions unit, including periods of startup and shutdown. The

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monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse shall be based upon the manufacturer's specifications until such time as any emission testing is conducted.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

D. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this

Emissions Unit ID: P001

emissions unit:

- a. each period of time when the pressure drop across the baghouse was outside of the range specified by the manufacturer;
- b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation: Particulate emissions (PE) shall not exceed 24.1 lbs/hr.

Applicable Compliance Method:

If required, compliance with the lb/hr limitation shall be determined in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 5.
 - b. Emission Limitation: PE shall not exceed 10.0 tons/yr.

Applicable Compliance Method:

Compliance with the annual limitation is demonstrated by multiplying 0.01 gr PE/dscf by the maximum volumetric air flow (24000 acfm), and the appropriate conversion factors of lb/7000 grains, 1 dscf/1 acfm, 60 minutes/hr. The resulting lb/hr emission rate is then multiplied by 8760, and then divided by 2000.
 - c. Emission Limitation: Visible particulate emissions from the baghouse stack

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serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with the test method and procedures in Method 9 of 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

None

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. 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 - (P002) - Blast booth number 2 controlled by a cartridge filter

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-17-07(A)	Visible particulate emissions from the baghouse stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 17.8 lbs/hr.
ORC 3704.03(T)(4)	PE shall not exceed 10.0 tons/yr.
	See A.2.a

2. Additional Terms and Conditions

- 2.a Permit to Install 06-08240 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

Cartridge filter with a design maximum outlet concentration of 0.01 gr PE/dscf.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously

Emissions Unit ID: P002

monitor and record the pressure drop, in inches of water, across the cartridge filter during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse shall be based upon the manufacturer's specifications until such time as any emission testing is conducted.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

D. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information

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concerning the operation of the control equipment during the operation of this emissions unit:

- a. each period of time when the pressure drop across the baghouse was outside of the range specified by the manufacturer;
- b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

E. Testing Requirements

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

- a. Emission Limitation: Particulate emissions (PE) shall not exceed 17.8 lbs/hr.

Applicable Compliance Method:

If required, compliance with the lb/hr limitation shall be determined in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 5.

- b. Emission Limitation: PE shall not exceed 10.0 tons/yr.

Applicable Compliance Method:

Compliance with the annual limitation is demonstrated by multiplying 0.01 gr PE/dscf by the maximum volumetric air flow (16000 acfm), and the appropriate conversion factors of lb/7000 grains, 1 dscf/1 acfm, 60 minutes/hr. The resulting lb/hr emission rate is then multiplied by 8760, and then divided by 2000.

Emissions Unit ID: **P002**

- c. Emission Limitation: Visible particulate emissions from the baghouse stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with the test method and procedures in Method 9 of 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

None

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. 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 - (R001) - Spray booth number 1 with dry filters

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Emissions of volatile organic compounds (VOC) shall not exceed 17.5 lb/hr; 76.7 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C), 3745-21-09 (U)(1)(d), 3745-17-11(B) and 3745-17-07(A).</p>
OAC rule 3745-31-05(C) (Synthetic minor to avoid Title V)	<p>Total emissions of VOC from R001, R002 and R003, combined, shall not exceed 89.8 tons as a rolling, 12-month summation.</p> <p>Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.</p> <p>Emissions of any combination of HAPs from this facility shall be less than 18.4 tons as a rolling, 12-month summation.</p> <p>See A.2.b</p>
OAC rule 3745-21-09 (U)(1)(d)	The VOC content of all metal coatings employed shall not exceed 3.5 pounds VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.
OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 pound per hour.
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six minute average, at any time.

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ORC 3704.03(T)(4)	PE shall not exceed 10.0 tons/yr. See A.2.a
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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 the particulate emissions from this air contaminant source since the calculated annual emission rate for particulate emissions is less than ten tons per year taking into account the federally enforceable rule limit of 0.551 lb/hr under OAC rule 3745-17-11(B).
- 2.b** The emissions units at this facility include spray booths R001, R002 and R003. Potential emissions from all other emissions units (blast booths P001 and P002), deminimis and exempt sources are less than one ton of VOC per year and 0.1 ton of total HAP per year, combined.

Based on information provided in the permit to install application, the facility Potential to Emit (PTE) for Hazardous Air Pollutants (HAP) is below the major source thresholds of 10 tons per year or more of any single HAP and 25 tons per year or more of any combination of HAP based on the facility operations and the maximum HAP content of the coatings/inks used. If any changes in the operations and/or coating formulations occur, the PTE calculation should be modified accordingly. Any increase in PTE above the major source thresholds would subject the source to any applicable Maximum Achievable Control Technology (MACT) and Title V requirements.

B. Operational Restrictions

1. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.
2. The weight of organic material in solvent evaporated (solvent usage), which is equivalent to VOC emissions, shall not exceed 89.8 tons during any 12-month rolling period from emissions units R001, R002 and R003, combined.

Compliance with this limitation shall be based upon a rolling, 12-month summation of facility-wide solvent usage, calculated monthly, using the following equation:

Solvent Usage = [Summation (pounds of coatings employed x solvent content of

Emissions Unit ID: R001

coatings in percent VOC by weight) + (pounds of cleanup solvent employed) for all calendar months] x 1 ton per 2000 pounds

3. To ensure enforceability with the annual solvent usage restriction during the first 12 calendar months of operation following the startup of emissions unit R001, R002 or R003, the permittee shall not exceed the usage levels specified in the following table in R001, R002 and R003, combined:

Month(s)	Maximum Allowable Solvent Usage (Tons)	Maximum Allowable Individual HAP Usage (Tons)	Maximum Allowable Total HAP Usage (Tons)
1	10.0	1.1	2.2
1 - 2	20.0	2.2	4.4
1 - 3	30.0	3.3	6.6
1 - 4	40.0	4.4	8.8
1 - 5	50.0	5.5	11.0
1 - 6	60.0	6.6	13.2
1 - 7	70.0	7.7	15.4
1 - 8	80.0	8.8	17.6
1 - 9	89.8	9.9	18.4
1 - 10	89.8	9.9	18.4
1 - 11	89.8	9.9	18.4
1 - 12	89.8	9.9	18.4

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual usage restrictions shall be based upon a rolling, 12-month summation of the monthly usage (emission) figures maintained in C.1 and C.2 below.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day during which the coating line uses any coating which exceeds 3.5 pounds VOC per gallon:
 - a. The name and identification number of each metal coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied.
 - c. The daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

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2. The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units R001, R002 and R003, combined:
 - a. the name and identification of each coating and cleanup material;
 - b. the number of gallons of coatings;
 - c. the number of gallons of cleanup materials;
 - d. the VOC content, as applied, in pounds per gallon;
 - e. the individual HAP content, for each HAP, in pounds per gallon;
 - f. total HAP content, in pounds per gallon;
 - g. the total VOC emissions from all coatings and cleanup materials employed [the sum of (b. times d.) for all coatings plus (c. times d.) for all cleanup materials] divided by 2000, in tons;
 - h. the individual HAP emissions from all coatings and cleanup materials employed [the sum of (b. times e.), for each HAP in all coatings plus (c. times e.) for each HAP in all cleanup materials] divided by 2000, in tons;
 - i. the total HAP emissions from all coatings and cleanup materials employed [the sum of (b. times f.) for all coatings plus (c. times f.) for all cleanup materials] divided by 2000, in tons;
 - j. during the first 12 months after the startup of emissions unit R001, R002 or R003, the cumulative total VOC emissions since startup;
 - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the total VOC emissions;
 - l. during the first 12 months after the startup of emissions unit R001, R002 or R003, the cumulative individual and total HAP emissions since startup; and
 - m. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the individual and total HAP emissions.

Emissions Unit ID: R001

3. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
4. The permit to install for emissions units R001, R002 and R003 were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (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: methyl n-amyl ketone (MAK)

TLV (mg/m³): 233.5

Maximum Hourly Emission Rate (lbs/hr): 4.82

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 266.5

MAGLC (ug/m³): 5430

5. 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 lowest TLV previously modeled, as documented in the most current 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

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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.).
6. 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 "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 the 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.

D. Reporting Requirements

1. The permittee shall notify the Southeast District Office in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Southeast District Office within 30 days after the exceedance occurs.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month solvent, individual HAP or total HAP usage limitations and, during the first 12 months after the startup of emissions unit R001, R002 or R003, all

Emissions Unit ID: **R001**

exceedances of the total cumulative VOC, individual HAP or total HAP usage limitations. These reports shall be sent to the Southeast District Office within 30 days after the exceedance occurs.

3. The permittee shall submit annual reports which include the following information:
 - a. the total emissions of VOC from emissions units R001, R002 and R003, combined, in tons;
 - b. the total emissions of each individual HAP from emissions units R001, R002 and R003, combined, in tons; and
 - c. the total emissions of all HAP from emissions units R001, R002 and R003, combined, in tons.

These reports shall be submitted by January 31 of each year and shall include information for each 12-month summation recorded during the previous calendar year.

4. The permittee shall notify the Director in writing of any daily record showing that the dry filters were 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 Ohio EPA, Southeast District Office (SEDO) within 30 days after the event occurs.

E. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 17.5 lb/hr; 76.7 tons per year.

Applicable Compliance Method:

The emission limitations represent the maximum potential of the emissions unit as determined by multiplying the maximum coating VOC content by the maximum usage rate for that coating and assuming continuous operation.

$(5 \text{ gal/hr})(3.5 \text{ lbs/gal}) = 17.5 \text{ lbs/hr}$

$(17.5 \text{ lbs/hr})(8760 \text{ hr.yr})(0.0005 \text{ ton/lb}) = 76.7 \text{ tons per year}$

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b. Emission Limitation:

Total emissions of VOC from R001, R002 and R003, combined, shall not exceed 89.8 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Sections C.1 and C.2 of this permit.

c. Emission Limitation:

Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Emissions of any combination of HAPs from this facility shall be less than 18.4 tons as a rolling, 12-month summation.

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Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2 of this permit.

d. Emission Limitation:

The VOC content of all metal coatings employed shall not exceed 3.5 pounds VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.1 of this permit.

e. Emission Limitation:

Particulate emissions shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

Compliance shall be determined by the following equation:

(max usage rate)(coating density)(solids fraction)(1-transfer efficiency)(1-control efficiency)

Currently: (5 gal/hr)(15.58 lbs/gal)(0.88 solids)(1 - 0.65 transfer)[(1 - 0.98 capture) + (0.98 capture)(1 - 0.9984 control)] = 0.517 lb/hr

f. Emission Limitation:

PE shall not exceed 10.0 tons/yr.

Applicable Compliance Method:

Compliance shall be determined by the summation of the results of the following equation for each coating: (annual usage)(coating density)(solids fraction)(1-transfer efficiency)[(1 - 0.98 capture) + (0.98 capture)(1 - 0.9984 control)](0.0005 ton/lb) = TPY

g. Emission Limitation:

Kimble Acquisition Company

DTL Application: 06 08210

Facility ID: 0679020185**Emissions Unit ID: R001**

Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six minute average, at any time.

Applicable Compliance Method:

If required, compliance with these emission limits shall be demonstrated in accordance with 40 CFR 60 Appendix A, Method 9.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound or VOC content of the coatings and cleanup materials.

F. Miscellaneous Requirements

None

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

- 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 - (R002) - Spray booth number 2 with dry filters

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Emissions of volatile organic compounds (VOC) shall not exceed 17.5 lb/hr; 76.7 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C), 3745-21-09 (U)(1)(d), 3745-17-11(B) and 3745-17-07(A).</p>
OAC rule 3745-31-05(C) (Synthetic minor to avoid Title V)	<p>Total emissions of VOC from R001, R002 and R003, combined, shall not exceed 89.8 tons as a rolling, 12-month summation.</p> <p>Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.</p> <p>Emissions of any combination of HAPs from this facility shall be less than 18.4 tons as a rolling, 12-month summation.</p> <p>See A.2.b</p>
OAC rule 3745-21-09 (U)(1)(d)	The VOC content of all metal coatings employed shall not exceed 3.5 pounds VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.
OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 pound per hour.
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six minute average, at any time.

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ORC 3704.03(T)(4)	PE shall not exceed 10.0 tons/yr. See A.2.a
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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 the particulate emissions from this air contaminant source since the calculated annual emission rate for particulate emissions is less than ten tons per year taking into account the federally enforceable rule limit of 0.551 lb/hr under OAC rule 3745-17-11(B).
- 2.b** The emissions units at this facility include spray booths R001, R002 and R003. Potential emissions from all other emissions units (blast booths P001 and P002), deminimis and exempt sources are less than one ton of VOC per year and 0.1 ton of total HAP per year, combined.

Based on information provided in the permit to install application, the facility Potential to Emit (PTE) for Hazardous Air Pollutants (HAP) is below the major source thresholds of 10 tons per year or more of any single HAP and 25 tons per year or more of any combination of HAP based on the facility operations and the maximum HAP content of the coatings/inks used. If any changes in the operations and/or coating formulations occur, the PTE calculation should be modified accordingly. Any increase in PTE above the major source thresholds would subject the source to any applicable Maximum Achievable Control Technology (MACT) and Title V requirements.

B. Operational Restrictions

1. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.
2. The weight of organic material in solvent evaporated (solvent usage), which is equivalent to VOC emissions, shall not exceed 89.8 tons during any 12-month rolling period from emissions units R001, R002 and R003, combined.

Compliance with this limitation shall be based upon a rolling, 12-month summation of facility-wide solvent usage, calculated monthly, using the following equation:

Solvent Usage = [Summation (pounds of coatings employed x solvent content of

Emissions Unit ID: R002

coatings in percent VOC by weight) + (pounds of cleanup solvent employed) for all calendar months] x 1 ton per 2000 pounds

3. To ensure enforceability with the annual solvent usage restriction during the first 12 calendar months of operation following the startup of emissions unit R001, R002 or R003, the permittee shall not exceed the usage levels specified in the following table in R001, R002 and R003, combined:

Month(s)	Maximum Allowable Solvent Usage (Tons)	Maximum Allowable Individual HAP Usage (Tons)	Maximum Allowable Total HAP Usage (Tons)
1	10.0	1.1	2.2
1 - 2	20.0	2.2	4.4
1 - 3	30.0	3.3	6.6
1 - 4	40.0	4.4	8.8
1 - 5	50.0	5.5	11.0
1 - 6	60.0	6.6	13.2
1 - 7	70.0	7.7	15.4
1 - 8	80.0	8.8	17.6
1 - 9	89.8	9.9	18.4
1 - 10	89.8	9.9	18.4
1 - 11	89.8	9.9	18.4
1 - 12	89.8	9.9	18.4

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual usage restrictions shall be based upon a rolling, 12-month summation of the monthly usage (emission) figures maintained in C.1 and C.2 below.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day during which the coating line uses any coating which exceeds 3.5 pounds VOC per gallon:
 - a. The name and identification number of each metal coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied.
 - c. The daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

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2. The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units R001, R002 and R003, combined:
 - a. the name and identification of each coating and cleanup material;
 - b. the number of gallons of coatings;
 - c. the number of gallons of cleanup materials;
 - d. the VOC content, as applied, in pounds per gallon;
 - e. the individual HAP content, for each HAP, in pounds per gallon;
 - f. total HAP content, in pounds per gallon;
 - g. the total VOC emissions from all coatings and cleanup materials employed [the sum of (b. times d.) for all coatings plus (c. times d.) for all cleanup materials] divided by 2000, in tons;
 - h. the individual HAP emissions from all coatings and cleanup materials employed [the sum of (b. times e.), for each HAP in all coatings plus (c. times e.) for each HAP in all cleanup materials] divided by 2000, in tons;
 - i. the total HAP emissions from all coatings and cleanup materials employed [the sum of (b. times f.) for all coatings plus (c. times f.) for all cleanup materials] divided by 2000, in tons;
 - j. during the first 12 months after the startup of emissions unit R001, R002 or R003, the cumulative total VOC emissions since startup;
 - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the total VOC emissions;
 - l. during the first 12 months after the startup of emissions unit R001, R002 or R003, the cumulative individual and total HAP emissions since startup; and
 - m. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the individual and total HAP emissions.

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3. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
4. The permit to install for emissions units R001, R002 and R003 were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (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: methyl n-amyl ketone (MAK)

TLV (mg/m³): 233.5

Maximum Hourly Emission Rate (lbs/hr): 4.82

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 266.5

MAGLC (ug/m³): 5430

5. 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 lowest TLV previously modeled, as documented in the most current 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";

Emissions Unit ID: **R002**

- 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.).
6. 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 "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 the 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.

D. Reporting Requirements

1. The permittee shall notify the Southeast District Office in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Southeast District Office within 30 days after the exceedance occurs.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month solvent, individual HAP or total HAP usage limitations and, during the first 12 months after the startup of emissions unit R001, R002 or R003, all

Emissions Unit ID: **R002**

exceedances of the total cumulative VOC, individual HAP or total HAP usage limitations. These reports shall be sent to the Southeast District Office within 30 days after the exceedance occurs.

3. The permittee shall submit annual reports which include the following information:
 - a. the total emissions of VOC from emissions units R001, R002 and R003, combined, in tons;
 - b. the total emissions of each individual HAP from emissions units R001, R002 and R003, combined, in tons; and
 - c. the total emissions of all HAP from emissions units R001, R002 and R003, combined, in tons.

These reports shall be submitted by January 31 of each year and shall include information for each 12-month summation recorded during the previous calendar year.

4. The permittee shall notify the Director in writing of any daily record showing that the dry filters were 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 Ohio EPA, Southeast District Office (SEDO) within 30 days after the event occurs.

E. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 17.5 lb/hr; 76.7 tons per year.

Applicable Compliance Method:

The emission limitations represent the maximum potential of the emissions unit as determined by multiplying the maximum coating VOC content by the maximum usage rate for that coating and assuming continuous operation.

$(5 \text{ gal/hr})(3.5 \text{ lbs/gal}) = 17.5 \text{ lbs/hr}$

$(17.5 \text{ lbs/hr})(8760 \text{ hr.yr})(0.0005 \text{ ton/lb}) = 76.7 \text{ tons per year}$

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b. Emission Limitation:

Total emissions of VOC from R001, R002 and R003, combined, shall not exceed 89.8 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Sections C.1 and C.2 of this permit.

c. Emission Limitation:

Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Emissions of any combination of HAPs from this facility shall be less than 18.4 tons as a rolling, 12-month summation.

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Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2 of this permit.

d. Emission Limitation:

The VOC content of all metal coatings employed shall not exceed 3.5 pounds VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.1 of this permit.

e. Emission Limitation:

Particulate emissions shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

Compliance shall be determined by the following equation:

(max usage rate)(coating density)(solids fraction)(1-transfer efficiency)(1-control efficiency)

Currently: (5 gal/hr)(15.58 lbs/gal)(0.88 solids)(1 - 0.65 transfer)[(1 - 0.98 capture) + (0.98 capture)(1 - 0.9984 control)] = 0.517 lb/hr

f. Emission Limitation:

PE shall not exceed 10.0 tons/yr.

Applicable Compliance Method:

Compliance shall be determined by the summation of the results of the following equation for each coating: (annual usage)(coating density)(solids fraction)(1-transfer efficiency)[(1 - 0.98 capture) + (0.98 capture)(1 - 0.9984 control)](0.0005 ton/lb) = TPY

g. Emission Limitation:

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Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six minute average, at any time.

Applicable Compliance Method:

If required, compliance with these emission limits shall be demonstrated in accordance with 40 CFR 60 Appendix A, Method 9.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound or VOC content of the coatings and cleanup materials.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

- 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 - (R003) - Spray booth number 3 with dry filters

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Emissions of volatile organic compounds (VOC) shall not exceed 17.5 lb/hr; 76.7 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C), 3745-21-09 (U)(1)(d), 3745-17-11(B) and 3745-17-07(A).</p>
OAC rule 3745-31-05(C) (Synthetic minor to avoid Title V)	<p>Total emissions of VOC from R001, R002 and R003, combined, shall not exceed 89.8 tons as a rolling, 12-month summation.</p> <p>Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.</p> <p>Emissions of any combination of HAPs from this facility shall be less than 18.4 tons as a rolling, 12-month summation.</p> <p>See A.2.b</p>
OAC rule 3745-21-09 (U)(1)(d)	The VOC content of all metal coatings employed shall not exceed 3.5 pounds VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.
OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 pound per hour.
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six minute average, at any time.

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ORC 3704.03(T)(4)	PE shall not exceed 10.0 tons/yr. See A.2.a
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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 the particulate emissions from this air contaminant source since the calculated annual emission rate for particulate emissions is less than ten tons per year taking into account the federally enforceable rule limit of 0.551 lb/hr under OAC rule 3745-17-11(B).
- 2.b** The emissions units at this facility include spray booths R001, R002 and R003. Potential emissions from all other emissions units (blast booths P001 and P002), deminimis and exempt sources are less than one ton of VOC per year and 0.1 ton of total HAP per year, combined.

Based on information provided in the permit to install application, the facility Potential to Emit (PTE) for Hazardous Air Pollutants (HAP) is below the major source thresholds of 10 tons per year or more of any single HAP and 25 tons per year or more of any combination of HAP based on the facility operations and the maximum HAP content of the coatings/inks used. If any changes in the operations and/or coating formulations occur, the PTE calculation should be modified accordingly. Any increase in PTE above the major source thresholds would subject the source to any applicable Maximum Achievable Control Technology (MACT) and Title V requirements.

B. Operational Restrictions

1. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.
2. The weight of organic material in solvent evaporated (solvent usage), which is equivalent to VOC emissions, shall not exceed 89.8 tons during any 12-month rolling period from emissions units R001, R002 and R003, combined.

Compliance with this limitation shall be based upon a rolling, 12-month summation of facility-wide solvent usage, calculated monthly, using the following equation:

Solvent Usage = [Summation (pounds of coatings employed x solvent content of

Emissions Unit ID: R003

coatings in percent VOC by weight) + (pounds of cleanup solvent employed) for all calendar months] x 1 ton per 2000 pounds

3. To ensure enforceability with the annual solvent usage restriction during the first 12 calendar months of operation following the startup of emissions unit R001, R002 or R003, the permittee shall not exceed the usage levels specified in the following table in R001, R002 and R003, combined:

Month(s)	Maximum Allowable Solvent Usage (Tons)	Maximum Allowable Individual HAP Usage (Tons)	Maximum Allowable Total HAP Usage (Tons)
1	10.0	1.1	2.2
1 - 2	20.0	2.2	4.4
1 - 3	30.0	3.3	6.6
1 - 4	40.0	4.4	8.8
1 - 5	50.0	5.5	11.0
1 - 6	60.0	6.6	13.2
1 - 7	70.0	7.7	15.4
1 - 8	80.0	8.8	17.6
1 - 9	89.8	9.9	18.4
1 - 10	89.8	9.9	18.4
1 - 11	89.8	9.9	18.4
1 - 12	89.8	9.9	18.4

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual usage restrictions shall be based upon a rolling, 12-month summation of the monthly usage (emission) figures maintained in C.1 and C.2 below.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day during which the coating line uses any coating which exceeds 3.5 pounds VOC per gallon:
 - a. The name and identification number of each metal coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied.
 - c. The daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

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2. The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units R001, R002 and R003, combined:
 - a. the name and identification of each coating and cleanup material;
 - b. the number of gallons of coatings;
 - c. the number of gallons of cleanup materials;
 - d. the VOC content, as applied, in pounds per gallon;
 - e. the individual HAP content, for each HAP, in pounds per gallon;
 - f. total HAP content, in pounds per gallon;
 - g. the total VOC emissions from all coatings and cleanup materials employed [the sum of (b. times d.) for all coatings plus (c. times d.) for all cleanup materials] divided by 2000, in tons;
 - h. the individual HAP emissions from all coatings and cleanup materials employed [the sum of (b. times e.), for each HAP in all coatings plus (c. times e.) for each HAP in all cleanup materials] divided by 2000, in tons;
 - i. the total HAP emissions from all coatings and cleanup materials employed [the sum of (b. times f.) for all coatings plus (c. times f.) for all cleanup materials] divided by 2000, in tons;
 - j. during the first 12 months after the startup of emissions unit R001, R002 or R003, the cumulative total VOC emissions since startup;
 - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the total VOC emissions;
 - l. during the first 12 months after the startup of emissions unit R001, R002 or R003, the cumulative individual and total HAP emissions since startup; and
 - m. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the individual and total HAP emissions.

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3. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
4. The permit to install for emissions units R001, R002 and R003 were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (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: methyl n-amyl ketone (MAK)

TLV (mg/m³): 233.5

Maximum Hourly Emission Rate (lbs/hr): 4.82

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 266.5

MAGLC (ug/m³): 5430

5. 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 lowest TLV previously modeled, as documented in the most current 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";

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- 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.).
6. 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 "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 the 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.

D. Reporting Requirements

- 1. The permittee shall notify the Southeast District Office in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Southeast District Office within 30 days after the exceedance occurs.
- 2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month solvent, individual HAP or total HAP usage limitations and, during the first 12 months after the startup of emissions unit R001, R002 or R003, all

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exceedances of the total cumulative VOC, individual HAP or total HAP usage limitations. These reports shall be sent to the Southeast District Office within 30 days after the exceedance occurs.

3. The permittee shall submit annual reports which include the following information:
 - a. the total emissions of VOC from emissions units R001, R002 and R003, combined, in tons;
 - b. the total emissions of each individual HAP from emissions units R001, R002 and R003, combined, in tons; and
 - c. the total emissions of all HAP from emissions units R001, R002 and R003, combined, in tons.

These reports shall be submitted by January 31 of each year and shall include information for each 12-month summation recorded during the previous calendar year.

4. The permittee shall notify the Director in writing of any daily record showing that the dry filters were 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 Ohio EPA, Southeast District Office (SEDO) within 30 days after the event occurs.

E. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 17.5 lb/hr; 76.7 tons per year.

Applicable Compliance Method:

The emission limitations represent the maximum potential of the emissions unit as determined by multiplying the maximum coating VOC content by the maximum usage rate for that coating and assuming continuous operation.
 $(5 \text{ gal/hr})(3.5 \text{ lbs/gal}) = 17.5 \text{ lbs/hr}$

Emissions Unit ID: **R003** $(17.5 \text{ lbs/hr})(8760 \text{ hr.yr})(0.0005 \text{ ton/lb}) = 76.7 \text{ tons per year}$

b. Emission Limitation:

Total emissions of VOC from R001, R002 and R003, combined, shall not exceed 89.8 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Sections C.1 and C.2 of this permit.

c. Emission Limitation:

Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Emissions of any combination of HAPs from this facility shall be less than 18.4 tons as a rolling, 12-month summation.

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Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2 of this permit.

d. Emission Limitation:

The VOC content of all metal coatings employed shall not exceed 3.5 pounds VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.1 of this permit.

e. Emission Limitation:

Particulate emissions shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

Compliance shall be determined by the following equation:

(max usage rate)(coating density)(solids fraction)(1-transfer efficiency)(1-control efficiency)

Currently: (5 gal/hr)(15.58 lbs/gal)(0.88 solids)(1 - 0.65 transfer)[(1 - 0.98 capture) + (0.98 capture)(1 - 0.9984 control)] = 0.517 lb/hr

f. Emission Limitation:

PE shall not exceed 10.0 tons/yr.

Applicable Compliance Method:

Compliance shall be determined by the summation of the results of the following equation for each coating: (annual usage)(coating density)(solids fraction)(1-transfer efficiency)[(1 - 0.98 capture) + (0.98 capture)(1 - 0.9984 control)](0.0005 ton/lb) = TPY

g. Emission Limitation:

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Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six minute average, at any time.

Applicable Compliance Method:

If required, compliance with these emission limits shall be demonstrated in accordance with 40 CFR 60 Appendix A, Method 9.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound or VOC content of the coatings and cleanup materials.

F. Miscellaneous Requirements

None