



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

5/11/2012

Scott Grieshop  
J & M MFG CO INC  
284 RAILROAD ST  
Fort Recovery, OH 45846

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

Facility ID: 0354000124  
Permit Number: P0109832  
Permit Type: Initial Installation  
County: Mercer

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Daily Standard. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

and Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

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

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





Permit Strategy Write-Up

1. Check all that apply:

X Synthetic Minor Determination

Netting Determination

2. Source Description: J&M Manufacturing operates a farm equipment manufacturing facility in Fort Recovery, Ohio.

3. Facility Emissions and Attainment Status: J&M Manufacturing is installing some paint /coating spray booths (emissions units K013 and K014) in a new building at the facility, to replace two older smaller booths (emissions units K011 and K012). The proposed installation and new operations essentially continues /transfers the previously established synthetic minor restrictions for volatile organic compounds (VOC) and hazardous air pollutants (HAP) for the facility (as contained in prior permit P0104794). Mercer County is in attainment for all criteria pollutants.

4. Source Emissions: J&M Manufacturing has requested the continuation of the synthetic minor restrictions of 76.8 tons per year VOC (70 tons per year for coating operations and 6.8 tons per year for clean-up operations) for emissions units K013 and K014.

J&M Manufacturing has also requested the continuation of the synthetic minor restrictions of 9.90 tons per year for any individual HAPs and 20.0 tons per year for any combination of HAPs. These restrictions include emissions units K013 and K014 (and also K005 - a paint dip tank).

K005 has a previously established synthetic minor VOC limit, of 4.85 tons per year (PTI 03-13936).

5. Conclusion: A synthetic minor restriction of 81.65 tons VOC per year total for K005, K013, K014 will effectively limit the potential emissions for the facility to be less than the Title V permitting major source threshold of 100 tons VOC. A synthetic minor restriction of 9.90 tons per year for any individual HAPs and 20.0 tons per year for any combination of HAPs will effectively limit the potential emissions for the facility to be less than the Title V permitting and MACT major source thresholds of 10 tons for any individual HAP and 25 tons for a combination of HAPs.

6. Please provide additional notes or comments as necessary:

None

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

Table with 2 columns: Pollutant, Tons Per Year. Rows include VOC (81.65), individual HAPs (9.90), and combined HAPs (20.0).



PUBLIC NOTICE

5/11/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

J & M MFG CO INC  
284 RAILROAD ST,  
Fort Recovery, OH 45846  
Mercer County

FACILITY DESC.: Farm Machinery and Equipment Manufacturing

PERMIT #: P0109832

PERMIT TYPE: Initial Installation

PERMIT DESC: Initial installation permit for new spray paint booths (replacement/upgrade for old booths K011 and K012) - (large) farm equipment.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461



**Ohio**

**Environmental  
Protection Agency**

**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
J & M MFG CO INC**

Facility ID:	0354000124
Permit Number:	P0109832
Permit Type:	Initial Installation
Issued:	5/11/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





Division of Air Pollution Control
Permit-to-Install and Operate
for
J & M MFG CO INC

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## Authorization

Facility ID: 0354000124

Application Number(s): A0043763

Permit Number: P0109832

Permit Description: Initial installation permit for new spray paint booths (replacement/upgrade for old booths K011 and K012) - (large) farm equipment.

Permit Type: Initial Installation

Permit Fee: \$800.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 5/11/2012

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

J & M MFG CO INC  
284 RAILROAD ST  
Fort Recovery, OH 45846

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0109832

Permit Description: Initial installation permit for new spray paint booths (replacement/upgrade for old booths K011 and K012) - (large) farm equipment.

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

**Group Name: Liquid Paint -Spray Operations**

<b>Emissions Unit ID:</b>	<b>K013</b>
Company Equipment ID:	Paint Spray Booth #4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K014</b>
Company Equipment ID:	Paint Spray Booth #5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

## **A. Standard Terms and Conditions**

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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

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

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

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

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

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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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

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

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

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

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

## **B. Facility-Wide Terms and Conditions**

**Draft Permit-to-Install and Operate**

J & M MFG CO INC

**Permit Number:** P0109832

**Facility ID:** 0354000124

**Effective Date:** To be entered upon final issuance

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.

## **C. Emissions Unit Terms and Conditions**

**1. Emissions Unit Group -Liquid Paint -Spray Operations: K013, K014**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K013	Paint Spray Booth #4 (with drying oven - 10.6 mmBtu/hr - n.g.) - metal parts
K014	Paint Spray Booth #5 (with drying oven - 10.6 mmBtu/hr - n.g.) - metal parts

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

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

a. b)(1)a, d)(8), d)(9), d)(10), d)(11), and e)(3).

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(D)	<p>38.5 lbs VOC /hr for coating operations (for emission units K013 and K014 individually)</p> <p>0.57 ton VOC /month for cleanup operations (for emission units K013 and K014, combined)</p> <p>9.90 tons per rolling, 12-month period for any individual hazardous air pollutants (HAPs); 20.0 tons per rolling, 12-month period for any combination of HAPs (for emissions units K005, K013 and K014, combined) [See b)(2)a.i.]</p> <p>76.8 tons VOC per rolling, 12-month period (for both coatings and cleanup materials, for emissions units K013 and K014, combined) [See b)(2)a.ii and c)(1).]</p>

**Draft Permit-to-Install and Operate**

J & M MFG CO INC

**Permit Number:** P0109832

**Facility ID:** 0354000124

**Effective Date:** To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	0.10 lb nitrogen oxides (NO <sub>x</sub> ) / mmBtu, and 4.64 tons NO <sub>x</sub> per year (for each oven, i.e. for K013 and K014 separately)  0.084 lb carbon monoxide (CO) / mmBtu, and 3.90 tons CO per year (for each oven, i.e. for K013 and K014 separately)  See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/1/2006	See b)(2)c.
d.	ORC 3704.03(T)	See b)(2)d.
e.	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, for extreme performance coatings
f.	OAC rule 3745-17-11(C)	See c)(2), c)(3), and d)(3) through d)(7).
g.	ORC 3704.04(F) OAC rule 3745-114-01	See d)(10), d)(11), d)(12), and e)(3).

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. 9.90 tons per rolling, 12-month period for any individual HAP, and 20.0 tons per rolling 12-month period for any combination of HAPs for emissions units K005, K013 and K014, combined. (see also P0109642)  
  
Federally enforceable limitations of 9.90 tons of any individual HAP and 20.0 tons of any combination of HAP's, per rolling, 12-month period, were initially established in a permit issued on January 21, 2010 (for former emissions units K011 and K012), and as such the facility has existing records of HAP emissions in lieu of establishing monthly HAP emissions restrictions for the first year of operation.
  - ii. 76.8 tons VOC per rolling, 12-month period, from emissions units K013 and K014, combined [See c)(1)].

- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- c. This rule applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
- The Best Available Technology (BAT) requirements listed under OAC rule 3745-31-05(A)(3) do not apply to the NO<sub>x</sub> or CO emissions from this air contaminant source since the uncontrolled potential to emit is less than 10 tons per year for each pollutant.
- d. The requirements of ORC 3704.03(T) include compliance with the requirements of OAC rule 3745-31-05(D).
- e. The hourly VOC emission limitation represents the potential to emit for each coating operation. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation. It should be noted that the hourly VOC emission limitation does not include VOC emissions associated with the combustion of natural gas in the drying ovens. VOC emissions from natural gas combustion are negligible and are not addressed in the hourly emission limitation.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of VOC-containing materials employed in emissions units K013 and K014, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_n [(V_i)(G_i) (1 \text{ ton} / 2000 \text{ lbs})] \leq 70.0$$

where,

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

V<sub>i</sub> = VOC content, in pounds per gallon, of each material employed

G<sub>i</sub> = gallons used of each VOC containing material for the rolling 12-month period

n = total number of unique VOC containing materials employed

A federally enforceable limitation of 76.8 tons VOC per rolling 12-month period were initially established in a permit issued on January 21, 2010 (for former emissions units K011 and K012), and as such the facility has existing records of VOC emissions in lieu of establishing monthly VOC emissions restrictions for the first year of operation.

- (2) The permittee shall install, operate, and maintain dry particulate filter system(s) for the surface coating operation(s) in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter(s) shall be employed during all periods of coating application to control particulate emissions.
- (3) The permittee shall expeditiously repair the dry particulate filter(s) or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device(s) is/are not operating in accordance with these requirements.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all materials containing any HAP that are applied in emissions units K005, K013, and K014, combined:
  - a. the name and identification number/code of each HAP-containing material;
  - b. the name/identification of each individual HAP contained in each material applied [and identified in d)(1)a above] and the pound(s) of each HAP (per gallon of material applied);
  - c. the number of gallons of each HAP-containing material applied during the month;
  - d. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., the summation of d)(1)b times d)(1)c, for all the materials applied during the month, divided by 2,000 pounds;
  - e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of d)(1)d for all HAPs;
  - f. for each individual HAP, the total emissions during the rolling, 12-month period, in ton(s); and
  - g. the total combined HAP emissions during the rolling, 12-month period, in ton(s).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

Any cleanup materials used (for K005, K013, and/or K014) which contain HAPs must also be included in the above record keeping requirements and calculations.

- (2) The permittee shall collect and record the following information each month for all coating and cleanup materials for emissions units K013 and K014, combined:
- a. the company name or identification for each coating material employed;
  - b. the volume, in gallons, of each coating material employed;
  - c. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2];
  - d. the VOC content of each coating material employed, (including water and exempt solvents) in pounds per gallon, as applied;
  - e. the VOC emission rate, in pounds, for each coating material employed [d)(2)b times d)(2)d];
  - f. the total VOC emission rate from all coating materials employed [summation of d)(2)e], in pounds or tons;
  - g. the name and identification number of each cleanup material employed;
  - h. the volume, in gallons, of each cleanup material employed;
  - i. the VOC content, in pounds per gallon, of each cleanup material employed; and
  - j. the VOC emission rate, in pounds, for each cleanup material employed [d)(2)h times d)(2)i]
  - k. the total VOC emission rate, in pounds, from all cleanup materials employed [summation of d)(2)j] for all cleanup material].
  - l. the rolling, 12-month VOC emission rate for coatings, i.e. rolling 12-month total of d)(2)f, in tons;
  - m. the rolling, 12-month VOC emission rate for cleanup, i.e. rolling 12-month total of d)(2)k, in tons; and
  - n. the rolling, 12-month total VOC emission rate [d)(2)l + d)(2)m], in pounds or tons.
- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for each dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (4) The permittee shall conduct periodic inspections of each dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a

frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of each dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (6) The permittee shall document each inspection (periodic and annual) of each dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

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

- (7) The permittee shall maintain records that document any time periods when the dry particulate filter(s) was/were not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (8) The PTI application for this emissions unit group was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
  - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

- i. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e.,  $X$  hours per day and  $Y$  days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Glycol Ether(s)

TLV (mg/m<sup>3</sup>): 97

Maximum Hourly Emission Rate: 6.33 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 229

MAGLC (ug/m<sup>3</sup>): 2300

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

- (9) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
  - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (10) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
  - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (11) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all coating and cleanup material usage and emissions restrictions in b)(2)a and c)(1).
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

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

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

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual PER. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (4) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of non-complying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

f) Testing Requirements

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

a. Emission Limitation:

38.5 lbs VOC /hr for coating operations (for emission units K013 and K014 individually)

Applicable Compliance Method:

The hourly allowable VOC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (11.0 gallons per hour) by the maximum allowable VOC content of the coating (3.5 pounds per gallon).

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

b. Emission Limitation:

3.5 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in d)(2)c.

c. Emission Limitation:

0.57 ton VOC /month for clean-up operations (for emission units K013 and K014, combined)

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in d)(2)k.

d. Emission Limitations:

9.90 tons per rolling 12-month period for any individual HAPs; 20.0 tons per rolling 12-month period for any combination of HAPs (for emissions units K013, K014, and K005, combined)

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in d)(1).

- e. Emission Limitation:  
76.8 tons VOC/rolling, 12-month period (for both coatings and clean-up materials, for emissions units K013 and K014, combined)

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in d)(2)n.

- f. Emissions Limitation:  
0.10 lb NO<sub>x</sub> per million Btu (for each oven, i.e. for K013 and K014 separately)

Applicable Compliance Method:

The emission limitation was established in accordance with an AP-42 emissions factor (Table 3.3-1, Oct 1996).

If required, compliance with the NO<sub>x</sub> emission limitation shall be determined in accordance with U.S. EPA Reference Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.

- g. Emissions Limitation:  
0.084 lb CO per million Btu (for each oven, i.e. for K013 and K014 separately)

Applicable Compliance Method:

The emission limitation was established in accordance with an AP-42 emissions factor (Table 3.3-1, Oct 1996).

If required, compliance with the CO emission limitation shall be determined in accordance with U.S. EPA Reference Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

- h. Emissions Limitations:  
4.64 tons NO<sub>x</sub> per year  
3.90 tons CO per year  
(for each oven, i.e. for K013 and K014 separately)

Applicable Compliance Method:

The annual emission limitations represent the potentials to emit for the emissions units, and were established by multiplying the lb /mmBtu limitation(s) by 10.6 mmBtu/hr and 8760 hrs/year, and then dividing by 2000 lbs/ton.

- (2) In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

**Draft Permit-to-Install and Operate**

J & M MFG CO INC

**Permit Number:** P0109832

**Facility ID:** 0354000124

**Effective Date:** To be entered upon final issuance

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC/OC contents of the coatings.

US EPA Method 24 or formulation data shall be used to determine the VOC/OC contents of the cleanup materials.

g) Miscellaneous Requirements

- (1) None.