



Environmental
Protection Agency

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

Certified Mail

5/14/2012

| | |
|-----|------------------------------------|
| 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) |

John Young
Steel Structures of Ohio, LLC
1324 Firestone Pkwy
Akron, OH 44301

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

Facility ID: 1677010316
Permit Number: P0109886
Permit Type: Renewal
County: Summit

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, Akron Beacon Journal. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308

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 Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
ARAQMD; Pennsylvania; West Virginia; Canada



Permit Strategy Write-Up

1. Check all that apply:

- X Synthetic Minor Determination
Netting Determination

2. Source Description: Steel Structures of Ohio, LCC performs metal coating of steel structures such as bridges and industrial buildings. The following emissions units are permitted at its facility located at 1324 Firestone Parkway, Akron, Ohio, 44301:

Table with 3 columns: EU ID, Description, Installation Date. Rows include K001 (Grayco& Boss Low Pressure Airless Painting Systems; Air Dry) and P003 (Wheelabrator Steel Shot Blast Booth).

3. Facility Emissions and Attainment Status: Some of the materials used in the facility’s manufacturing processes contain ingredients which are listed as hazardous air pollutants (HAP) under Section 112(b) of the Clean Air Act. Other air contaminants emitted from these sources are volatile organic compounds (VOC) and particulate matter (PM). Steel Structures of Ohio, LLC is located in Summit County, which is in attainment for all criteria air pollutants, except particulate matter with an aerodynamic diameter of 2.5 microns or less (PM2.5).

4. Source Emissions: Federally enforceable permit-to-install and operate (FEPTIO) P0109886 takes into account the following facility-wide emissions limitations, as proposed by the permittee, for the purpose of avoiding the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products under 40 CFR Part 63, Subpart M, as well as avoiding Title V applicability: 9.9 tons of individual HAP and 24.9 tons of combined HAP per rolling, 12-month period. These federally enforceable limitations are based on a maximum annual coating usage restriction of 6,864 gallons per year, based upon a rolling, 12-month summation of the coating usage figures.

5. Conclusion: Compliance with the rolling, 12-month HAP emission limitations and coating usage process variable restriction will be demonstrated by the associated monitoring, recordkeeping and reporting requirements to ensure this facility remains a synthetic minor source, through OAC rule 3745-31-05(D), with respect to HAP emissions. Issuance of FEPTIO #P0109886 is recommended.

6. Please provide additional notes or comments as necessary: None.

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

Summary table with 2 columns: Pollutant, Tons Per Year. Rows: Individual HAP (9.9), Combined HAP (24.9).

PUBLIC NOTICE

5/14/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

Steel Structures of Ohio, LLC

1324 Firestone Parkway,

Akron, OH 44301

Summit County

FACILITY DESC.: Fabricated Structural Metal Manufacturing

PERMIT #: P0109886

PERMIT TYPE: Renewal

PERMIT DESC: FEPTIO renewal permit for metal coating line and steel shot blast booth with baghouse control device.

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: Kelly Kanoza, Akron Regional Air Quality Management District, 146 South High Street, Room 904, Akron, OH 44308. Ph: (330)375-2480

Ohio

**Environmental
Protection Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Steel Structures of Ohio, LLC**

| | |
|----------------|-----------------------------------|
| Facility ID: | 1677010316 |
| Permit Number: | P0109886 |
| Permit Type: | Renewal |
| Issued: | 5/14/2012 |
| 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
Steel Structures of Ohio, LLC

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Authorization

Facility ID: 1677010316

Application Number(s): A0044295

Permit Number: P0109886

Permit Description: FEPTIO renewal permit for metal coating line and steel shot blast booth with baghouse control device.

Permit Type: Renewal

Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 5/14/2012

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:

Steel Structures of Ohio, LLC
1324 Firestone Parkway
Akron, OH 44301

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:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

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: P0109886

Permit Description: FEPTIO renewal permit for metal coating line and steel shot blast booth with baghouse control device.

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

Emissions Unit ID:

K001

Company Equipment ID: Surface Coating Line
Superseded Permit Number: P0102691
General Permit Category and Type: Not Applicable

Emissions Unit ID:

P003

Company Equipment ID: Wheelabrator (Serial No. A125517)
Superseded Permit Number: P0102691
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 Akron Regional Air Quality Management District 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 submitting¹ 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.

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) The combined annual emissions from this facility shall not exceed 9.9 tons of individual hazardous air pollutants (HAP) and 24.9 tons of combined HAP, based upon a rolling, 12-month summation of the monthly emissions. This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions upon issuance of this permit.
 - (2) The maximum annual coating usage at this facility shall not exceed 6,864 gallons per year, based upon a rolling, 12-month summation of the coating usage figures. This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage upon issuance of this permit.
 - (3) The permittee shall collect and record the following information each month for all materials containing any HAP that are applied at the facility:
 - a. the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;
 - b. the name/identification of each individual HAP contained in each material applied and identified in b)(3)a., and the pound(s) of each HAP per gallon of each HAP-containing material applied;
 - c. the number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;
 - d. for each individual HAP, the total emissions from all the materials employed, in ton(s) [i.e., for each individual HAP, the summation of the products b)(3)b. times b)(3)c. for all the materials applied during the month, divided by 2,000 pounds];
 - e. the total combined HAP emissions from all the materials employed during the month, in ton(s) [i.e., the summation of all the individual HAPs emissions from b)(3)d.];
 - f. for each individual HAP, the total emissions during the rolling, 12-month period, in ton(s) [i.e., the summation of the individual HAP emissions, as recorded in b)(3)d., for the present month plus the previous 11 months of operation]; and

- g. the total combined HAP emissions during the rolling 12-month period, in ton(s) [i.e., the summation of all HAP emissions, as recorded in b)(3)e., for the present month plus the previous 11 months of operation].

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.

- (4) The permittee shall maintain monthly records of the following information:
 - a. The facility-wide coating usage for each month; and
 - b. the rolling, 12-month summation of the facility-wide coating usage.
- (5) 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 exceedances of the rolling, 12-month emission limitation for each individual HAP;
 - ii. all exceedances of the rolling, 12-month emission limitation for all the HAPs combined ; and
 - iii. all exceedances of the rolling, 12-month coating usage limitation;
 - 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).



- (6) Compliance with the emissions limitations specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

9.9 tons of individual HAP per rolling, 12-month period

24.9 tons of combined HAP per rolling, 12-month period

Applicable Compliance Method:

Compliance with the allowable HAP emission limitations identified above shall be demonstrated by the monitoring and record keeping requirements specified in b)(3).

C. Emissions Unit Terms and Conditions



1. K001, Surface Coating Line

Operations, Property and/or Equipment Description:

Grayco& Boss Low Pressure Airless Painting Systems; Air Dry

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. None.

(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. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|--|---|
| a. | OAC rule 3745-31-05(A)(3) | See b)(2)a. |
| b. | OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V | See b)(2)b. |
| c. | OAC rule 3745-21-09(U)(1)(c) & (i) | 3.5 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents, for any extreme performance coating applied to miscellaneous metal parts and products. 3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, for any other coating applied to miscellaneous metal parts and products. |
| d. | OAC rule 3745-17-11(C) | See (c)(1) & (2) |

- (2) Additional Terms and Conditions
- a. Pursuant to OAC rule 3745-31-05(A)(3)(a)(i), Best Available Technology (BAT) is not required because this air contaminant source was installed before January 1, 1974.
 - b. Emissions unit K001 is part of the facility-wide, federally enforceable hazardous air pollutant (HAP) emissions limitations and maximum annual coating usage restriction established under section B.1.b) of this permit for the purpose of avoiding the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products under 40 CFR Part 63, Subpart M, as well as avoiding Title V applicability.
- c) Operational Restrictions
- (1) The permittee shall operate the dry filtration system for the control of PE whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
 - (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each month and maintain the information at the facility for a period of three years:
 - a. the name and identification number of each coating, as applied; and
 - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.

This information does not have to be kept on a line-by-line basis. Also, if complying coatings are mixed at a coating line, it is not necessary to record the VOC content of the resulting mixture.
 - (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or Local Air Agency upon request.
 - (3) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a

copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

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

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

- (6) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- e) Reporting Requirements
- (1) The permittee shall notify the director of any monthly record showing the use of noncomplying coatings. A copy of such record shall be sent to the appropriate Ohio EPA District Office or Local Air Agency within thirty days following the end of the calendar month.
 - (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.

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 Limitations:

3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, for any extreme performance coating applied to miscellaneous metal parts and products.

3.0 lbs VOC/gallon of coating, excluding water and exempt solvents, for any other coating applied to miscellaneous metal parts and products.

Applicable Compliance Method:

Compliance with the metal coating VOC content limitations identified above shall be demonstrated by the monitoring and record keeping requirements specified in d)(1).

- (2) In accordance with OAC rule 3745-21-10, U.S. EPA Method 24 shall be used to determine the VOC content of coatings and cleanup materials, where formulation data is not based on the same method or if it is determined to be necessary by the Director.
- (3) 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 U.S. EPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 11.4 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 U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

g) Miscellaneous Requirements

- (1) None.



2. P003, Wheelabrator (Serial No. A125517)

Operations, Property and/or Equipment Description:

Wheelabrator Steel Shot Blast Booth (Serial No. A125517), controlled with a baghouse (Model 112-D).

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. None.

(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. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|--|
| a. | OAC rule 3745-31-05(A)(3) | See b(2)a. |
| b. | OAC rule 3745-17-07(A)(1) | Visible particulate emissions (PE) from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule. |
| c. | OAC rule 3745-17-11(B)(1) | PE shall not exceed 10.4 pounds per hour. |

(2) Additional Terms and Conditions

a. Pursuant to OAC rule 3745-31-05(A)(3)(a)(i), Best Available Technology (BAT) is not required because this air contaminant source was installed before January 1, 1974.

c) Operational Restrictions

- (1) The baghouse and associated control equipment serving this emissions unit shall be employed at all times the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall document all times the baghouse and/or associated control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item d)(2)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) 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.

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:

Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the stack visible PE limitation identified above shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

b. Emission Limitation:

PE shall not exceed 10.4 lbs/hr

Applicable Compliance Method:

Compliance with the hourly allowable PE limitation identified above shall be demonstrated by multiplying the maximum usage rate of abrasive steel material (3,200 lbs/hr) by the controlled emission factor of 0.69 lb PE/1,000 lbs abrasive (AP-42 Table 13.2.6-1, September 1997).

If required, compliance with the hourly allowable PE limitation shall be determined by emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.