



Environmental Protection Agency

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

6/7/2012

DAVE STEWART
Worthington Cylinder Corporation
333 MAXTOWN RD
WESTERVILLE, OH 43082

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0121000211
Permit Number: P0108664
Permit Type: Renewal
County: Delaware

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
No	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director 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, made payable to "Ohio Treasurer Josh Mandel," 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

If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-CDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Worthington Cylinder Corporation**

Facility ID:	0121000211
Permit Number:	P0108664
Permit Type:	Renewal
Issued:	6/7/2012
Effective:	6/7/2012
Expiration:	6/7/2017



Division of Air Pollution Control
Permit-to-Install and Operate
for
Worthington Cylinder Corporation

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Authorization

Facility ID: 0121000211
Application Number(s): A0042633, A0042636, A0042640, A0042648
Permit Number: P0108664
Permit Description: Renewal FEPTIO for emissions units that coat propane tanks and tanks for commercial vehicles. The facility has a synthetic minor for HAPs.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 6/7/2012
Effective Date: 6/7/2012
Expiration Date: 6/7/2017
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Worthington Cylinder Corporation
333 E MAXTOWN RD
Westerville, OH 43081

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

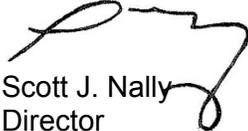
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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: P0108664

Permit Description: Renewal FEPTIO for emissions units that coat propane tanks and tanks for commercial vehicles. The facility has a synthetic minor for HAPs.

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

Emissions Unit ID:	B001
Company Equipment ID:	GAS/ELECTRIC ANNEALING FURNACE
Superseded Permit Number:	P0000312
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	K001
Company Equipment ID:	PB1, PB2, PB01, PB02, C1
Superseded Permit Number:	P0000313
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	P001
Company Equipment ID:	Belt Furnace
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Spray Booth (Nutro Corporation)

Emissions Unit ID:	K002
Company Equipment ID:	K002
Superseded Permit Number:	01-12084
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	K003
Superseded Permit Number:	01-12084
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, Central 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 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

Final Permit-to-Install and Operate

Worthington Cylinder Corporation

Permit Number: P0108664

Facility ID: 0121000211

Effective Date: 6/7/2012

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. B001, GAS/ELECTRIC ANNEALING FURNACE

Operations, Property and/or Equipment Description:

Walking beam annealing furnace

- 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) (Established by PTI 01-5128, issued final 10/26/1994)	Emissions from particulate matter (PM) shall not exceed: 0.03 pound per hour (lb/hr) and 0.13 ton per year (tpy); Emissions from sulfur dioxide (SO ₂) shall not exceed: 0.004 lb/hr and 0.017 tpy; Emissions from volatile organic compounds (VOC) shall not exceed: 0.032 lb/hr and 0.14 tpy; Emissions from nitrogen oxides (NO _x) shall not exceed:

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.60 lb/hr and 2.63 tpy; and Emissions from carbon monoxide (CO) shall not exceed: 7.08 lbs/hr and 31.01 tpy. See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

(2) Additional Terms and Conditions

- a. The hourly and annual emission limitations were established to reflect the potential to emit for these emissions units. Therefore, it is not necessary to develop monitoring, recordkeeping and/or reporting requirements to ensure compliance with this limit.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions 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) 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.

- (2) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

0.03 lb PM/hr and 0.13 tpy;

0.004 lb SO₂/hr and 0.017 tpy;

0.032 lb VOC/hr and 0.14 tpy;

0.60 lbNO_x /hr and 2.63 tpy; and

7.08 lbs CO/hr and 31.01 tpy.

Applicable Compliance Method

PMemissions may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (6,000 cu. Ft/hr) by an emissions factor for natural gas of 1.9 lbs PE/mmscf. This emission factor is specified in USEPA reference

document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 1-5.

SO₂ emissions may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (6,000 cu. Ft/hr) by an emissions factor for natural gas of 0.6 lb SO₂/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6C.

VOC emissions may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (6,000 cu. Ft/hr) by an emissions factor for natural gas of 5.8 lbs VOC/mmscf. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A.

NO_x emissions may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (6,000 cu. Ft/hr) by an emissions factor for natural gas of 140 lbs NO_x/mmscf. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E.

CO emissions may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (6,000 cu. Ft/hr) by an emissions factor for natural gas of 35 lbs CO/mmscf. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760 hrs/yr, and dividing by 2000 lbs/ton).

b. Emission Limitation

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

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

g) Miscellaneous Requirements

- (1) None.

2. K001, PB1, PB2, PB01, PB02, C1

Operations, Property and/or Equipment Description:

Powder coating line

- 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) (Established by PTI 01-5128, issued final 10/26/1994)	Emissions from particulate matter (PM) shall not exceed: 0.381 pound per hour (lb/hr) and 1.67 ton per year(tpy); Emissions from sulfur dioxide (SO ₂) shall not exceed: 0.005 lb/hr and 0.022 tpy; Emissions from nitrogen oxides (NO _x) shall not exceed: 0.82 lb/hr and 3.59 tpy; and Emissions from carbon monoxide (CO) shall not exceed:

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.164 lb/hr and 0.72 tpy See b)(2)a.
b.	OAC rule 3745-17-11(C)	See b)(2)b., c)(1), d)(1) – (4)

(2) Additional Terms and Conditions

- a. The hourly and annual emission limitations were established to reflect the potential to emit for these emissions units. Therefore, it is not necessary to develop monitoring, recordkeeping and/or reporting requirements to ensure compliance with this limit.
- b. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

c) Operational Restrictions

- (1) The permittee shall install and operate a dry filtration system for the control of particulate emissions 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.

d) Monitoring and/or Recordkeeping Requirements

- (1) 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.
- (2) 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.
- (3) 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.

- (4) 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) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

0.381 lb PM/hr and 1.67 tpy;

0.005 lb SO₂/hr and 0.022 tpy;

0.82 lbNO_x/hr and 3.59 tpy; and

0.164 lbs CO/hr and 0.72 tpy.

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with the PM emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 1-5.

If required, the permittee shall demonstrate compliance with the SO₂ emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6C.

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If required, the permittee shall demonstrate compliance with the NO_x emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E.

If required, the permittee shall demonstrate compliance with the CO emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760 hrs/yr, and dividing by 2000 lbs/ton).

g) Miscellaneous Requirements

(1) None.

3. P001, Belt Furnace

Operations, Property and/or Equipment Description:

7.4 MMBtu/hr Continuous Mesh Belt Annealing Furnace

- 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) (Established by PTI 01-5607, issued 3/15/1995)	Emissions from particulate matter (PM) shall not exceed: 0.04 pound per hour (lb/hr) and 0.18 ton per year (tpy); Emissions from sulfur dioxide (SO ₂) shall not exceed: 0.005 lb/hr and 0.02 tpy; Emissions from nitrogen oxides (NO _x) shall not exceed: 0.80 lb/hr and 3.50 tpy; Emissions for volatile organic compounds (VOC) shall not exceed:

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.04 lb/hr and 0.18 tpy; and Emissions from carbon monoxide (CO) shall not exceed: 2.39 lbs/hr and 10.46 tpy. See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11	

(2) Additional Terms and Conditions

a. The hourly and annual emission limitations were established to reflect the potential to emit for these emissions units. Therefore, it is not necessary to develop monitoring, recordkeeping and/or reporting requirements to ensure compliance with this limit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions 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) 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.

- (2) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

0.04 lb PM/hr and 0.18 tpy;

0.005 lb SO₂/hr and 0.02 tpy;

0.04 lb VOC/hr and 0.18 tpy;

0.80 lbNO_x /hr and 3.50 tpy; and

2.39 lbs CO/hr and 10.46 tpy.

Applicable Compliance Method

PMemissions may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (7,400 cu. Ft/hr) by an emissions factor for natural

gas of 1.9 lbs PE/mmscf. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 1-5.

SO₂ emissions may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (7,400 cu. Ft/hr) by an emissions factor for natural gas of 0.6 lb SO₂/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6C.

VOC emissions may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (7,400 cu. Ft/hr) by an emissions factor for natural gas of 5.8 lbs VOC/mmscf. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A.

NO_x emissions may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (7,400 cu. Ft/hr) by an emissions factor for natural gas of 140 lbs NO_x/mmscf. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E.

CO emissions may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (7,400 cu. Ft/hr) by an emissions factor for natural gas of 35 lbs CO/mmscf. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760 hrs/yr, and dividing by 2000 lbs/ton).

b. Emission Limitation

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

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

g) Miscellaneous Requirements

- (1) None.

4. Emissions Unit Group -Spray Booth (Nutro Corporation): K002,K003,

EU ID	Operations, Property and/or Equipment Description
K002	Spray Booth (Nutro Corporation) for Air Brake Tank Interior.
K003	Spray Booth (Nutro Corporation) for Air Brake Tank Exterior with drying oven.

- 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. See d)(9) – (12), e)(4)
- (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. See b)(2)b., c)(1), c)(3), d)(2) – (3), e)(2)c. – h., f)(1)c., and f)(1)g. – h.
- 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) (Established by PTI 01-12084, issued 2/27/2007)	Volatile organic compound (VOC) emissions shall not exceed: 36 pounds per hour (lbs/hr) from coating operations; and 26.4 lbs/hr from cleanup operations. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C), 3745-35-07(B), and 3745-21-09(U)(1). See b)(2)a.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid NSR and Title V)	VOC emissions from coating shall not exceed 30 tons per rolling, 12-month period. See c)(1)

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p><u>For K002 and K003:</u></p> <p>VOC emissions from cleanup material shall not exceed 4.4 tons per rolling, 12-month period.</p> <p>The combined total hazardous air pollutants (HAP) emissions shall not exceed 9.9 tons per rolling 12-month period for any single HAP and 24.9 tons per rolling 12-month period for all HAPs from all coating and cleanup materials.</p> <p>See b)(2)b., c)(3)</p>
c.	OAC rule 3745-21-09(U)(1)(i)	See c)(2), c)(4)
d.	OAC rule 3745-17-11(A)	<p>Particulate emissions (PE) shall not exceed 0.65 lb/hr.</p> <p>See b)(2)c.</p>
e.	OAC rule 3745-17-11(C)	See b)(2)d., c)(5), d)(4) – (8)
f.	ORC 3704.03(T)(4)	See d)(9) – (12), e)(4)

(2) Additional Terms and Conditions

- a. The hourly VOC emission limitation was established to reflect the potential to emit for these emissions units. Therefore, it is not necessary to develop monitoring, recordkeeping and/or reporting requirements to ensure compliance with this limit.
- b. This emissions unit 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.
- c. Per the rule, the allowable hourly emissions limitation for PE is greater than the potential to emit for this emissions unit without control. Therefore, no additional monitoring, recordkeeping and/or reporting is necessary to ensure compliance with this limit.
- d. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

c) Operational Restrictions

- (1) The maximum annual coating usage for K002 and K003 shall not exceed 20,000 gallons applied based upon a rolling, 12-month period.

- (2) The maximum VOC coating content shall not exceed 3.0 pounds VOC per gallon (lbs VOC/gal), excluding water and exempt solvents.
 - (3) The maximum annual cleanup material usage for emissions units K002 and K003 combined shall not exceed 1,320 gallons, based upon a rolling, 12-month period.
 - (4) The maximum cleanup material content shall not exceed 6.6 lbs VOC/gal, excluding water and exempt solvents.
 - (5) The permittee shall install and operate a dry filtration system for the control of particulate emissions 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.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain monthly records of the following for K002 and K003:
 - a. the company name and identification number for each coating material employed;
 - b. the total number of gallons of coating material employed, excluding water and exempt solvents;
 - c. the VOC content of each coating employed, in pounds per gallon, excluding water and exempt solvents;
 - d. the VOC emissions from the coating materials employed, excluding water and exempt solvents;
 - e. the updated rolling, 12-month summation of the total VOC emissions in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - (2) The permittee shall collect and record the following information each month for K002 and K003:
 - a. the company name and identification number for each cleanup material employed;
 - b. the total number of gallons of cleanup material employed, excluding water and exempt solvents;
 - c. the VOC content of each cleanup material employed, in pounds per gallon, excluding water and exempt solvents;
 - d. the VOC emissions from the cleanup materials employed, excluding water and exempt solvents;
 - e. the amount of cleanup material recovered, in pounds;

- f. the total monthly VOC emissions from cleanup operations, in pounds per month [i.e., d)(2)d. – d)(2)e.]
 - g. the updated rolling, 12-month summation of the total VOC emissions in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- (3) The permittee shall collect and record the following information each month for K002 and K003:
- a. the individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - b. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
 - c. the number of gallons of each coating employed;
 - d. the name and identification of each cleanup/solvent material employed;
 - e. the individual HAP content of each HAP of each cleanup/solvent material in pounds of individual HAP per gallon cleanup/solvent material, as applied;
 - f. the total combined HAP content of each cleanup/solvent material in pounds of combined HAPs per gallon of cleanup/solvent material, as applied (sum of all individual HAP contents from f.)
 - g. the number of gallons of each cleanup/solvent material employed;
 - h. the total individual HAP emissions for each HAP from all coating and cleanup/solvent material in pounds or tons per rolling, 12-month period (for each HAP the sum of b. times d. for each coating and the sum of f. times h. for each cleanup/solvent material); and
 - i. The total combined HAP emissions from all coating and cleanup/solvent materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c. times e. for each coating plus the sum of g. times h. for each cleanup/solvent material).
- A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting you Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvent contained in the interior coatings or clean materials. This information does not have to be kept on a line by line basis.
- (4) 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.

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- (5) 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.
- (6) 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.
- (7) 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.

- (8) 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.
- (9) The permit-to-install and operate (PTIO) application for this/these emissions unit(s), K002 and K003, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. 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., "8" hours per day and "5" 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):

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

- 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: acetone

TLV (mg/m³): 1,187.12

Maximum Hourly Emission Rate (lbs/hr): 18

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 810.9

MAGLC (ug/m³): 28,300

Toxic Contaminant: n-butyl acetate

TLV (mg/m³): 712.6

Maximum Hourly Emission Rate (lbs/hr): 16.1

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 725.27

MAGLC (ug/m3): 16,966.67

Toxic Contaminant: n-butyl alcohol (n-butanol)

TLV (mg/m3): 60.63

Maximum Hourly Emission Rate (lbs/hr): 3

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.10

MAGLC (ug/m3): 1443.6

The permittee, has demonstrated that emissions of acetone, n-butyl acetate, and n-butanol, from emissions unit(s) K002 and K003, 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).

- (10) 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 PTIO 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.

(11) 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.

(12) 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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying 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.

(2) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

- a. the VOC content limit for coating materials;
- b. the VOC content for cleanup materials;
- c. the rolling, 12-month coating usage limitation;
- d. the rolling, 12-month VOC emission limitation;

- e. the rolling, 12-month cleanup usage limitation for K002 and K003 combined;
- f. the rolling, 12-month VOC emission limitation, from cleanup material, for K002 and K003 combined;
- g. the rolling, 12-month total individual HAP emission limitation for K002 and K003 combined; and
- h. the rolling, 12-month total combined HAPs emission limitation for K002 and K003 combined.

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).

- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (4) The permittee shall 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 Permit Evaluation Report (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.
- (5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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
36 lbs VOC/hr from coating operations

Applicable Compliance Method

Compliance has been demonstrated by multiplying the maximum hourly coating usage rate of 12 gal/hr by the maximum VOC content of 3.0 lbs/gal.

b. Emission Limitation

26.4 lbs VOC/hr from cleanup operations

Applicable Compliance Method

Compliance has been demonstrated by multiplying the maximum hourly cleanup usage rate of 4 gal/hr by the maximum VOC content of 6.6 lbs/gal.

c. Emission Limitation

VOC emissions from all coatings shall not exceed 30 tons, as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements in Section d)(1)e.

d. Emission Limitation

3 lbs VOC/gal of coating, excluding water and exempt solvents

Applicable Compliance Method

Compliance with the VOC content of the coatings applied shall be based upon the recordkeeping requirements in Section d)(1)c. Formulation data from the coating manufacturer and/or, if required, USEPA Method 24 (or an alternative approved method) shall be used to determine the VOC content of the coatings, to be used in the calculation of emissions.

e. Emission Limitation

6.6 lbs VOC/gal of cleanup material, excluding water and exempt solvents

Applicable Compliance Method

Compliance with the VOC content of the coatings applied shall be based upon the recordkeeping requirements in Section d)(2)c. Formulation data from the coating manufacturer and/or, if required, USEPA Method 24 (or an alternative approved method) shall be used to determine the VOC content of the coatings, to be used in the calculation of emissions.

f. Emission Limitation

VOC emissions from cleanup materials applied in emissions units K002 and K003 combined shall not exceed 4.4 tons per rolling, 12-month summation

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements in Section d)(2)g.

g. Emission Limitation

The individual HAP emissions shall not exceed 9.9 tons per rolling, 12-month period for all single HAP from all coatings and cleanup materials used in emissions units K002 and K003 combined.

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements in Section d)(3)h.

h. Emission Limitation

The combined total HAPs emissions shall not exceed 24.9 tons per rolling, 12-month period for all HAPs from all coatings and cleanup materials used in units K002 and K003 combined.

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements in Section d)(3)i.

g) Miscellaneous Requirements

(1) None.