



Environmental Protection Agency

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

Certified Mail

6/7/2012

Ed Cortez
Alpha Coatings, Inc.
P.O. BOX 1006
Fostoria, OH 44830

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)

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

Facility ID: 0374010217
Permit Number: P0109740
Permit Type: Renewal
County: Seneca

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Advertiser Tribune. 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 Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

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

Sincerely,

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

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



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination
 Netting Determination

2. Source Description:

Alpha Coatings Inc. is an automotive rubber and metal parts coating operation located in Seneca County. The company has submitted a PTIO application to more accurately reflect the facility's operation. Included in this permit is a facility-wide cleaning/parts preparation operation (P801), manual spray booths (K001-K005), paint curing ovens (P001-P007) and paint spray booths with dry filtration (R001-R008).

3. Facility Emissions and Attainment Status:

Alpha Coatings is located in Seneca County and is classified as a synthetic minor facility for Title V and MACT. Seneca County is designated as attainment for all criteria pollutants.

4. Source Emissions:

Alpha has proposed to change their existing federally enforceable OC emission limitation (OC emission limitation will effectively restrict volatile organic compound emissions) of 75.0 ton per rolling, 365 day period to a rolling, 12-month period for all emissions units, (P801, K001-K005, P001-P007 and R001-R008, combined). In addition, the company has requested to maintain their existing federally enforceable limitations to restrict the hazardous air pollutants (HAPs) to 9.90 tons per rolling, 12-month period for any individual HAPs and 24.90 tons per rolling, 12-month period for any combination of HAPs.

5. Conclusion:

As part of the company's strategy to avoid Title V and MACT applicability, this FEPTIO will incorporate federally enforceable permit conditions to limit the facility's OC emissions to 75.0 tons of VOC per rolling, 12-month period and limit the facility's HAPs emissions to 9.90 tons per rolling, 12-month period for any individual HAP and 24.90 tons per rolling, 12-month period for any combination of HAPs. Therefore, the company will remain a synthetic minor facility and Title V and MACT permitting requirements will not apply.

6. Please provide additional notes or comments as necessary:

None

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	75.0
Individual HAP	9.90
Combined HAPs	24.90

PUBLIC NOTICE
6/7/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

Alpha Coatings, Inc.
622 S Corporate Dr,
Fostoria, OH 44830
Seneca County

FACILITY DESC.: All Other Motor Vehicle Parts Manufacturing

PERMIT #: P0109740

PERMIT TYPE: Renewal

PERMIT DESC: Renewal FEPTIO for all spray booths (K001-K005), paint curing lines (P001-P007 and R001-R008) and facility-wide cleanup and parts preparation (P801).

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



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Alpha Coatings, Inc.**

Facility ID:	0374010217
Permit Number:	P0109740
Permit Type:	Renewal
Issued:	6/7/2012
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
Alpha Coatings, Inc.

Table of Contents

Authorization 1
A. Standard Terms and Conditions 4
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 5
2. Who is responsible for complying with this permit? 5
3. What records must I keep under this permit? 5
4. What are my permit fees and when do I pay them?..... 5
5. When does my PTIO expire, and when do I need to submit my renewal application? 5
6. What happens to this permit if my project is delayed or I do not install or modify my source? 6
7. What reports must I submit under this permit? 6
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? 6
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 6
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 7
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 7
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 7
13. Can I transfer this permit to a new owner or operator?..... 8
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 8
15. What happens if a portion of this permit is determined to be invalid? 8
B. Facility-Wide Terms and Conditions..... 9
C. Emissions Unit Terms and Conditions 11
1. P801, Facility-Wide Cleaning/Parts Prep Operations 12
2. Emissions Unit Group -Manual Spray Booths: K001,K002,K003,K004,K005 20
3. Emissions Unit Group -Paint Cure Oven Line: P001,P002,P003,P004,P005,P006,P007, 30
4. Emissions Unit Group -Paint Spray Booth Line: R001,R002,R003,R004,R005,R006,R007,R008, 39

Authorization

Facility ID: 0374010217

Application Number(s): A0044101

Permit Number: P0109740

Permit Description: Renewal FEPTIO for all spray booths (K001-K005), paint curing lines (P001-P007 and R001-R008) and facility-wide cleanup and parts preparation (P801).

Permit Type: Renewal

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

Issue Date: 6/7/2012

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:

Alpha Coatings, Inc.
622 S Corporate Dr
Fostoria, OH 44830

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0109740

Permit Description: Renewal FEPTIO for all spray booths (K001-K005), paint curing lines (P001-P007 and R001-R008) and facility-wide cleanup and parts preparation (P801).

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

Emissions Unit ID:	P801
Company Equipment ID:	Facility-Wide Cleaning/Parts Prep Operations
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Manual Spray Booths

Emissions Unit ID:	K001
Company Equipment ID:	Manual Spray Booth 1
Superseded Permit Number:	P0104078
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Manual Spray Booth 2
Superseded Permit Number:	P0104078
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Manual Spray Booth 3
Superseded Permit Number:	P0104078
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K004
Company Equipment ID:	Manual Spray Booth 4
Superseded Permit Number:	P0104078
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K005
Company Equipment ID:	Turn Table
Superseded Permit Number:	P0104078
General Permit Category and Type:	Not Applicable

Group Name: Paint Cure Oven Line

Emissions Unit ID:	P001
Company Equipment ID:	Line 1 Oven
Superseded Permit Number:	03-17121
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	Line 2 Oven
Superseded Permit Number:	03-17121
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	Line 3 Oven
Superseded Permit Number:	03-17121
General Permit Category and Type:	Not Applicable

Draft Permit-to-Install and Operate

Alpha Coatings, Inc.

Permit Number: P0109740

Facility ID: 0374010217

Effective Date: To be entered upon final issuance

Emissions Unit ID:	P004
Company Equipment ID:	Line 4 Oven
Superseded Permit Number:	03-17121
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	Line 5 Oven
Superseded Permit Number:	03-17121
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	Line 6 Oven
Superseded Permit Number:	03-17121
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P007
Company Equipment ID:	Lines 7-8 Oven
Superseded Permit Number:	03-17388
General Permit Category andType:	Not Applicable

Group Name: Paint Spray Booth Line

Emissions Unit ID:	R001
Company Equipment ID:	Paint Spray Booth Line 1
Superseded Permit Number:	03-17121
General Permit Category andType:	Not Applicable
Emissions Unit ID:	R002
Company Equipment ID:	Paint Spray Booth Line 2
Superseded Permit Number:	03-17121
General Permit Category andType:	Not Applicable
Emissions Unit ID:	R003
Company Equipment ID:	Paint Spray Line 3
Superseded Permit Number:	03-17121
General Permit Category andType:	Not Applicable
Emissions Unit ID:	R004
Company Equipment ID:	Paint Spray Line 4
Superseded Permit Number:	03-17121
General Permit Category andType:	Not Applicable
Emissions Unit ID:	R005
Company Equipment ID:	Paint Spray Line 5
Superseded Permit Number:	03-17121
General Permit Category andType:	Not Applicable
Emissions Unit ID:	R006
Company Equipment ID:	Paint Spray Line 6
Superseded Permit Number:	03-17121
General Permit Category andType:	Not Applicable
Emissions Unit ID:	R007
Company Equipment ID:	Paint Spray Line 7
Superseded Permit Number:	03-17388
General Permit Category andType:	Not Applicable
Emissions Unit ID:	R008
Company Equipment ID:	Paint Booth 8
Superseded Permit Number:	03-17388
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by 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

Draft Permit-to-Install and Operate

Alpha Coatings, Inc.

Permit Number: P0109740

Facility ID: 0374010217

Effective Date: To be entered upon final issuance

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

C. Emissions Unit Terms and Conditions

1. P801, Facility-Wide Cleaning/Parts Prep Operations

Operations, Property and/or Equipment Description:

Facility-wide cleanup operations

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

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

a. b)(1)c., d)(4) through d)(7), and 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. b)(1)b., b)(2)a., b)(2)b., b)(2)c., d)(2), d)(3), e)(2), f)(1)b. and f)(1)c.

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)	3434.25 lbs organic compounds (OC)/month; 21.0 tons OC/yr for the facility-wide cleanup and parts preparation operations
b.	OAC rule 3745-31-05(D)	75.0 tons OC per rolling, 12-month period for emissions units P001-P007, R001-R008, K001-K005, and P801, combined 9.9 tons per rolling, 12-month period for any individual HAP* and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units P001-P007, R001-R008, K001-K005 and P801, combined
c.	OAC rule 3745-114-01	See d)(4) through d)(7)

- (2) Additional Terms and Conditions
- a. For the purpose of federal enforceability, OC emission limitations will effectively restrict volatile organic compounds (VOC) emissions.
 - b. The permittee has requested a federally enforceable limitation of 75.0 tons OC per rolling, 12-month period for emissions units P001-P007, R001-R008, K001-K005, and P801, combined, for the purposes of avoiding Title V and PSD applicability. These emissions units are existing operations and, as such, have existing records of OC emissions in lieu of establishing monthly OC emission restrictions for the first year of operation.
 - c. The permittee has requested federally enforceable limitations of 9.9 tons of any individual HAP and 24.9 tons of combined HAPs per rolling, 12-month period for emissions units P001-P007, R001-R008, K001-K005, and P801, combined, for purposes of avoiding Title V and MACT applicability. These emissions units are existing operations and, as such, have existing records of HAP emissions in lieu of establishing monthly HAP emission restrictions for the first year of operation.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain monthly records of the following information for cleanup and parts preparation materials employed for the facility-wide cleanup and parts preparation operations:
 - a. the company name and identification for each cleanup material employed;
 - b. the volume, in gallons, of each cleanup and parts preparation material employed;
 - c. the OC content of each cleanup and parts preparation material employed, in pound per gallon;
 - d. the OC emission rate, in pounds, for each cleanup and parts preparation material employed (d)(1)b. times d)(1)c.;
 - e. the total OC emissions rate from all cleanup and parts preparation materials employed (summation of d)(1)d.; and
 - f. the annual year-to-date OC emissions, in tons, from all cleanup and parts preparation materials employed (summation of d)(1)e. for each calendar month to date from January to December times 1 ton/2000 lbs).
 - (2) In order to demonstrate compliance with the 12-month, rolling OC emission limitation, the permittee shall collect and record the following information each month for emissions units P001-P007, R001-R008, K001-K005 and P801, combined:

Draft Permit-to-Install and Operate

Alpha Coatings, Inc.

Permit Number: P0109740

Facility ID: 0374010217

Effective Date: To be entered upon final issuance

- a. the company identification for each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the OC content of each coating and cleanup material, in pounds per gallon,
- d. the OC emission rate [summation of d)(2)b. times d)(2)c. for all coatings and cleanup materials employed]; and
- e. the 12-month summation, in tons, of the monthly OC emission rates.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

- (3) In order to demonstrate compliance with the 12-month, rolling HAP emission limitations, the permittee shall collect and record the following information each month for emissions units P001-P007, R001-R008, K001-K005 and P801, combined:

- a. the company identification of each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon;
- d. the emission rate, in pounds, for each individual HAP from each coating and cleanup material employed [d)(3)b. times d)(3)c.];
- e. the total emission rate for each HAP from all coatings and cleanup materials employed [summation of d)(3)d. for each individual HAP], in pounds per month;
- f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed [summation of d)(3)e.], in pounds per month;
- g. the rolling, 12-month summation, in tons, of each individual HAP; and
- h. the rolling, 12-month summation, in tons, of the combination of all HAPs.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

- (4) The FEPTIO application for these emissions unit(s), P001-P007, R001-R008, K001-K005, and P801 was evaluated based on the actual materials and the design parameters of the emissions units' 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 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., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants or "worst case" toxic contaminant(s):

Toxic Contaminant: Cyclohexane w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 1,033 (*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 89.60 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 22,481

MAGLC (ug/m3): 24,587

The following summarizes the results of dispersion modeling for the significant toxic contaminants or "worst case" toxic contaminant(s):

Draft Permit-to-Install and Operate

Alpha Coatings, Inc.

Permit Number: P0109740

Facility ID: 0374010217

Effective Date: To be entered upon final issuance

Toxic Contaminant: Methyl N-propyl Ketone w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 705 (*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 36.35 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 9,121

MAGLC (ug/m3): 16,783

The following summarizes the results of dispersion modeling for the significant toxic contaminants or "worst case" toxic contaminant(s):

Toxic Contaminant: Methyl Isobutyl Ketone w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 205 (*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 2.05 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 515

MAGLC (ug/m3): 4,877

The following summarizes the results of dispersion modeling for the significant toxic contaminants or "worst case" toxic contaminant(s):

Toxic Contaminant: Toluene w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 188 (*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 4.52 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 496.5

MAGLC (ug/m3): 1794.28

The permittee, having demonstrated that emissions of cyclohexane, methyl N-propyl ketone and methyl isobutyl ketone, from emissions units P001-P007, R001-R008, K001-K005, and P801 is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit(s) at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and 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).

- (5) 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", ORC 3704.03(F), 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 FEPTIO 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.

- (6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":
- 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.
- (7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The permittee shall submit 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.
 - (2) 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 OC; and
 - ii. all exceedances of the rolling, 12-month emission limitation for HAPs
 - 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.
 - (3) 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.
 - (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.

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:

3434.25 lbs OC/month; 21.0 tons OC/yr for facility-wide cleanup and parts preparation operations

Applicable Compliance Method:

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

b. Emission Limitation:

Combined limits for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, R008, K001, K002, K003, K004, K005 and P801:

75.0 tons OC per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the record keeping requirements specified in d)(2).

c. Emission Limitations:

Combined limits for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, R008, K001, K002, K003, K004, K005 and P801:

9.9 tons individual HAP per rolling, 12-month period

24.9 tons combined HAPs per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with these emissions limitations in accordance with the recordkeeping requirements specified in d)(3).

(2) Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group -Manual Spray Booths: K001,K002,K003,K004,K005

EU ID	Operations, Property and/or Equipment Description
K001	misc. metal parts spray booth (manual spray booth #1)
K002	misc. metal parts spray booth (manual spray booth #2)
K003	misc. metal parts spray booth (manual spray booth #3)
K004	misc. metal parts spray booth (manual spray booth #4)
K005	misc. metal parts turn table spray booth with pre-heat unit and infrared 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. b)(1)d., d)(9) through d)(12), and e)(5).

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

a. b)(1)b., b)(2)b., b)(2)c., b)(2)d., d)(2), d)(3), e)(2), f)(1)d. and f)(1)e.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	12.64 lbs organic compounds/hr when coating non-metal parts from each emissions unit K001-K005 63.20 lbs organic compounds (OC)/day and 11.53 tons OC/year when coating miscellaneous metal parts from each emissions unit, K001-K005 See b)(2)a.
b.	OAC rule 3745-31-05(D)	75.0 tons OC per rolling, 12-month period for emissions units P001-P007, R001-R008, K001-K005, and P801, combined 9.9 tons per rolling, 12-month period for

Draft Permit-to-Install and Operate

Alpha Coatings, Inc.

Permit Number: P0109740

Facility ID: 0374010217

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		any individual HAP* and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units P001-P007, R001-R008, K001-K005 and P801, combined See b)(2)b. through b)(2)d.
c.	OAC rule 3745-21-09(U)(1)	Exempt, pursuant to OAC rule 3745-21-09(U)(2)(e)(iii). See b)(2)f.
d.	OAC rule 3745-17-11(C)	See c)(1) and c)(2)
e.	OAC rule 3745-114-01	See d)(11) through d)(14) and e)(5)

*Hazardous Air Pollutant (HAP), as defined in Section 112(b) of the Clean Air Act

(2) Additional Terms and Conditions

- a. The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D), and OAC rule 3745-21-09(U)(2)(e)(iii).
- b. For the purpose of federal enforceability, OC emission limitations will effectively restrict VOC emissions.
- c. This permit establishes a federally enforceable limitation of 75.0 tons OC per rolling, 12-month period for emissions units P001-P007, R001-R008, K001-K005 and P801, combined, for the purposes of avoiding Title V and PSD applicability.

A federally enforceable limitation of 75.0 tons OC per rolling, 12-month period was initially established in permit to install 03-13939 issued on 6/5/03 and as such the facility has existing records of OC emissions in lieu of establishing monthly OC emissions restrictions for the first year of operation.

- d. The permittee has requested federally enforceable limitations of 9.9 tons of any individual HAP and 24.9 tons of any combination of HAPs per rolling, 12-month periods for emissions units P001-P007, R001-R008, K001-K005 and P801, as a group, for the purposes of avoiding Title V and MACT applicability.

Federally enforceable limitations of 9.9 tons of any individual HAP and 24.9 tons of any combination of HAPs per rolling, 12-month was initially established in permit to install 03-13939 issued on 6/5/03 and as such the facility has existing records of HAP emissions in lieu of establishing monthly OC emissions restrictions for the first year of operation.

- e. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

- f. The permittee shall not employ more than 10 gallons of coating per day for the coating of miscellaneous metal parts in any individual coating booth (K001-K005).

c) Operational Restrictions

- (1) 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.
- (2) The permittee shall operate the 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) On any day when coating metal parts, the permittee shall collect and record the following information each day for each miscellaneous metal parts spray booth (K001, K002, K003, K004, and K005 for the coatings used for the metal parts):
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the OC content of each coating, in pounds per gallon, as applied;
 - d. the total OC emission rate from all coatings employed, in pounds [summation of d)(1)b. times d)(1)c. for all coatings]; and
 - e. the total volume, in gallons, of all of the coatings employed.
- (2) In order to demonstrate compliance with the 12-month, rolling OC emission limitation, the permittee shall collect and record the following information each month for emissions units P001-P007, R001-R008, K001-K005 and P801, combined:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material, in pounds per gallon,
 - d. the OC emission rate [summation of d)(2)b. times d)(2)c. for all coatings and cleanup materials employed]; and
 - e. the 12-month summation, in tons, of the monthly OC emission rates.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

- (3) In order to demonstrate compliance with the 12-month, rolling HAP emission limitations, the permittee shall collect and record the following information each month for emissions units P001-P007, R001-R008, K001-K005 and P801, combined:
- a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon;
 - d. the emission rate, in pounds, for each individual HAP from each coating and cleanup material employed [d)(3)b. times d)(3)c.];
 - e. the total emission rate for each HAP from all coatings and cleanup materials employed [summation of d)(3)d. for each individual HAP], in pounds per month;
 - f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed [summation of d)(3)e.], in pounds per month;
 - g. the rolling, 12-month summation, in tons, of each individual HAP; and
 - h. the rolling, 12-month summation, in tons, of the combination of all HAPs.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

- (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.
- (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:

Draft Permit-to-Install and Operate

Alpha Coatings, Inc.

Permit Number: P0109740

Facility ID: 0374010217

Effective Date: To be entered upon final issuance

- 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 federally enforceable permit-to-install and operate (FEPTIO) application for these emissions units, P001-P007, R001-R008, K001-K005 and P801, was evaluated based on the actual materials and the design parameters of the emissions units' 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., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: Xylene

TLV (mg/m³): 434.19

Maximum Hourly Emission Rate (lbs/hr): 39.0

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 2,451.0

MAGLC (µg/m³): 10,333

Toxic Contaminant: Ethyl Benzene

TLV (mg/m³): 434.19

Maximum Hourly Emission Rate (lbs/hr): 9.2

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 578.0

MAGLC (µg/m³): 10,333

Toxic Contaminant: Toluene

TLV (mg/m³): 75.36

Maximum Hourly Emission Rate (lbs/hr): 14.5

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 911.0

MAGLC (µg/m³): 1,795

The permittee, has demonstrated that emissions of xylene, ethyl benzene, and toluene from emissions unit(s) K001, K002, K003, K004, and K005 were 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 PTI, PTIO, or FEPTIO (as applicable) 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 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.

- (2) 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. 75.0 tons OC per rolling, 12-month period for emissions units P001-P007, R001-R008, K001-K005 and P801, combined;
- ii. 9.9 tons individual HAP per rolling, 12-month period for emissions units P001-P007, R001-R008, K001-K005 and P801, combined;
- iii. 24.9 tons combined HAPs per rolling, 12-month period for emissions units P001-P007, R001-R008, K001-K005 and P801, combined; and

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.

- (3) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 10 gal/day of coating material on metal parts. 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 45 days after the exceedance occurs.

- (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 emission limitations specified in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation:

12.64 lbs OC/hr when coating non-metal parts from each emissions unit, K001-K005

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission unit's potential to emit*. Therefore, no hourly monitoring, record keeping, reporting or compliance method calculations are required to demonstrate compliance with the limitation.

*The potential to emit for this emissions unit was based on a maximum OC content of 6.32 lbs/gallon and a maximum hourly usage rate of 2 gallon/hr. This emission limitation is based on a worst-case scenario that all OC emissions from the paint booth and its associated oven are emitted from the booth.

- b. Emission Limitation:

63.20 pounds OC/day, when coating miscellaneous metal parts from each emissions unit, K001-K005

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1)d.

- c. Emission Limitation:

11.53 tons OC/year, from coating operations when coating miscellaneous metal parts from each emissions unit, K001-K005

Applicable Compliance Method:

The annual emission limitation was established by multiplying the daily OC emission limitation by a maximum operating schedule of 365 days per year and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the daily emission limitation, compliance with the annual emission limitation will be assumed.

d. Emission Limitation:

Combined limits for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, R008, K001, K002, K003, K004, K005 and P801:

75.0 tons OC per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the record keeping requirements specified in d)(4).

e. Emission Limitations:

Combined limits for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, R008, K001, K002, K003, K004, K005 and P801:

9.9 tons individual HAP per rolling, 12-month period

24.9 tons combined HAPs per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with these emissions limitations in accordance with the record keeping requirements specified in d)(5).

f. Emissions Limitation:

Coating usage in each individual emissions unit (K001, K002, K003, K004, and K005) shall not exceed 10 gallons per day for the coating of miscellaneous metal parts.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1)e.

- (2) Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

g) Miscellaneous Requirements

- (1) None.

3. Emissions Unit Group -Paint Cure Oven Line: P001,P002,P003,P004,P005,P006,P007,

EU ID	Operations, Property and/or Equipment Description
P001	Paint cure oven (L-1, S-1).
P002	Paint cure oven (L-2, S-2).
P003	Paint cure oven (L-3, S-3)..
P004	Paint cure oven (L-4b, S-4).
P005	Paint cure oven (L-5, S-5)..
P006	infrared paint cure oven (paint line 6).
P007	infrared curing oven no 7.

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

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

a. b)(1)d., d)(4) through d)(7), and e)(5).

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

a. b)(1)b., b)(2)a., b)(2)b., b)(2)c., b)(2)d., d)(2), d)(3), e)(2), f)(1)b. and f)(1)c.

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)	2.74 tons organic compounds (OC)/yr for each emissions unit P001-P007
b.	OAC rule 3745-31-05(D)	75.0 tons OC per rolling, 12-month period for emissions units P001-P007, R001-R008, K001-K005, and P801, combined 9.9 tons per rolling, 12-month period for any individual HAP* and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units P001-P007, R001-R008, K001-K005 and P801, combined See b)(2)a. through b)(2)d.

Draft Permit-to-Install and Operate

Alpha Coatings, Inc.

Permit Number: P0109740

Facility ID: 0374010217

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-21-07(M)(4)	OC emissions shall not exceed 3 lbs/hr and 15 lbs/day
d.	OAC rule 3745-114-01	See d)(4) through d)(7) and e)(5)

* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

(2) Additional Terms and Conditions

- a. The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-21-01(M)(4).
- b. For the purpose of federal enforceability, OC emission limitations will effectively restrict volatile organic compounds (VOC) emissions.
- c. The permittee has requested a federally enforceable limitation of 75.0 tons OC per rolling, 12-month period for emissions units P001-P007, R001-R008, K001-K005, and P801, combined, for the purposes of avoiding Title V and PSD applicability. These emissions units are existing operations and, as such, have existing records of OC emissions in lieu of establishing monthly OC emission restrictions for the first year of operation.
- d. The permittee has requested federally enforceable limitations of 9.9 tons of any individual HAP and 24.9 tons of combined HAPs per rolling, 12-month period for emissions units P001-P007, R001-R008, K001-K005, and P801, combined, for purposes of avoiding Title V and MACT applicability. These emissions units are existing operations and, as such, have existing records of HAP emissions in lieu of establishing monthly HAP emission restrictions for the first year of operation.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) For purposes of calculating the OC emission rates for these emissions units and the associated spray booths (R001-R008 and P001-P007), the permittee shall utilize a value of 80% as the maximum percentage of the OCs employed in the spray booths that are emitted uncontrolled from the spray booths. The remaining 20% of the OCs employed in the spray booths shall be considered to be the uncontrolled emissions from these emissions units.
- (2) In order to demonstrate compliance with the hourly and daily OC emission limits, the permittee shall collect and record the following information each day for the oven:
 - a. The total potential daily organic compound emission rate for all coatings employed in the paint booth associated with this emissions unit, multiplied by the maximum percentage of the emissions associated with this emissions unit [as defined in d)(1) of this permit], in pounds/day;

- b. The total number of hours this emissions unit was in operation; and
 - c. The average hourly organic compound emission rate [d)(2)a. / d)(2)b.], in pounds/hr.
- (3) In order to demonstrate compliance with the 12-month, rolling OC emission limitation, the permittee shall collect and record the following information each month for emissions units P001-P007, R001-R008, K001-K005 and P801, combined:
- a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material, in pounds per gallon,
 - d. the OC emission rate [summation of d)(3)b. times d)(3)c. for all coatings and cleanup materials employed]; and
 - e. the rolling, 12-month summation, in tons, of the monthly OC emission rates.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

- (4) In order to demonstrate compliance with the 12-month, rolling HAP emission limitations, the permittee shall collect and record the following information each month for emissions units P001-P007, R001-R008, K001-K005 and P801, combined:
- a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon;
 - d. the emission rate, in pounds, for each individual HAP from each coating and cleanup material employed [d)(4)b. times d)(4)c.];
 - e. the total emission rate for each HAP from all coatings and cleanup materials employed [summation of d)(4)d. for each individual HAP], in pounds per month;
 - f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed [summation of d)(4)e.], in pounds per month;
 - g. the rolling, 12-month summation, in tons, of each individual HAP; and
 - h. the rolling, 12-month summation, in tons, of the combination of all HAPs.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

(5) The FEPTIO application for these emissions units, P001-P007, R001-R008, K001-K005, and P801 was evaluated based on the actual materials and the design parameters of the emissions units' 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 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., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants or "worst case" toxic contaminant(s):

Toxic Contaminant: Cyclohexane w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 1,033 (*for which toxic, if using worst case)

Draft Permit-to-Install and Operate

Alpha Coatings, Inc.

Permit Number: P0109740

Facility ID: 0374010217

Effective Date: To be entered upon final issuance

Maximum Hourly Emission Rate (lbs/hr): 89.60 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 22,481

MAGLC (ug/m3): 24,587

The following summarizes the results of dispersion modeling for the significant toxic contaminants or "worst case" toxic contaminant(s):

Toxic Contaminant: Methyl N-propyl Ketone w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 705 (*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 36.35 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 9,121

MAGLC (ug/m3): 16,783

The following summarizes the results of dispersion modeling for the significant toxic contaminants or "worst case" toxic contaminant(s):

Toxic Contaminant: Methyl Isobutyl Ketone w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 205 (*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 2.05 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 515

MAGLC (ug/m3): 4,877

The following summarizes the results of dispersion modeling for the significant toxic contaminants or "worst case" toxic contaminant(s):

Toxic Contaminant: Toluene w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 188 (*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 4.52 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 496.5

MAGLC (ug/m3): 1794.28

The permittee, having demonstrated that emissions of cyclohexane, methyl N-propyl ketone and methyl isobutyl ketone, from emissions units P001-P007, R001-R008, K001-K005, and P801 is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit(s) at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and 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).

- (6) 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", ORC 3704.03(F), 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 FEPTIO 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.

- (7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":
- 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.);

Draft Permit-to-Install and Operate

Alpha Coatings, Inc.

Permit Number: P0109740

Facility ID: 0374010217

Effective Date: To be entered upon final issuance

- 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.
- (8) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The permittee shall submit 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.
 - (2) 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 OC; and
 - ii. all exceedances of the rolling, 12-month emission limitation for HAPs
 - 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.

- (3) 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.
- (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.

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:

2.74 tons OC/yr for each emissions unit P001-P007

Applicable Compliance Method:

The annual OC emission limitation was established by multiplying the maximum daily OC emission rate of 15 lb/day by 365 days/yr and dividing by 2000 lbs/1 ton. Therefore, provided compliance is shown with the daily OC emission rate, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitation:

Combined limits for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, R008, K001, K002, K003, K004, K005 and P801:

75.0 tons OC per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with the rolling, 12-month emission limitation in accordance with the record keeping requirements specified in d)(2).

c. Emission Limitations:

Combined limits for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, R008, K001, K002, K003, K004, K005 and P801:

9.9 tons individual HAP per rolling, 12-month period

24.9 tons combined HAPs per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with the rolling, 12-month emission limitation in accordance with the record keeping requirements specified in d)(3).

d. Emission Limitations:

3 lbs OC/hr; 15 lbs OC/day

Applicable Compliance Method:

The permittee shall demonstrate compliance with these emission limitations in accordance with the record keeping requirements specified in d)(2).

If required, the permittee shall demonstrate compliance with the hourly allowables OC emission limitation in accordance with Methods 18, 25, or 15A, as appropriate, of 40 CFR Part 60 Appendix A.

- (2) Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

g) Miscellaneous Requirements

- (1) None.

4. Emissions Unit Group -Paint Spray Booth Line: R001,R002,R003,R004,R005,R006,R007,R008,

EU ID Operations, Property and/or Equipment Description

- R001 Paint spray booth with dry filtration (L-1, S-1).
- R002 Paint spray booth with dry filtration (L-2, S-2).
- R003 Paint spray booth with dry filtration (L-3, S-3).
- R004 Paint spray booth with dry filtration (L-4, S-4).
- R005 Paint spray booth with dry filtration (L-5, S-5).
- R006 coating booth with dry filtration (paint line 6).
- R007 paint spray booth no 7 with dry filtration.
- R008 paint spray booth no 8 with dry filtration.

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

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

a. b)(1)c., d)(4) through d)(7), and 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. b)(1)b., b)(2)a., b)(2)b., b)(2)c., d)(2), d)(3), e)(2), f)(1)b. and f)(1)c.

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)	25.60 lbs organic compounds (OC)/hr for each emissions unit R001-R008
b.	OAC rule 3745-31-05(D)	75.0 tons OC per rolling, 12-month period for emissions units P001-P007, R001-R008, K001-K005, and P801, combined 9.9 tons per rolling, 12-month period for any individual HAP* and 24.9 tons per rolling, 12-month period for any

Draft Permit-to-Install and Operate

Alpha Coatings, Inc.

Permit Number: P0109740

Facility ID: 0374010217

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		combination of HAPs for emissions units P001-P007, R001-R008, K001-K005 and P801, combined See b)(2)a. through b)(2)c.
c.	OAC rule 3745-114-01	See d)(4) through d)(7) and e)(5)

*Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act

(2) Additional Terms and Conditions

- a. For the purpose of federal enforceability, OC emission limitations will effectively restrict volatile organic compounds (VOC) emissions.
- b. The permittee has requested a federally enforceable limitation of 75.0 tons OC per rolling, 12-month period for emissions units P001-P007, R001-R008, K001-K005, and P801, combined, for the purposes of avoiding Title V and PSD applicability. These emissions units are existing operations and, as such, have existing records of OC emissions in lieu of establishing monthly OC emission restrictions for the first year of operation.
- c. The permittee has requested federally enforceable limitations of 9.9 tons of any individual HAP and 24.9 tons of combined HAPs per rolling, 12-month period for emissions units P001-P007, R001-R008, K001-K005, and P801, combined, for purposes of avoiding Title V and MACT applicability. These emissions units are existing operations and, as such, have existing records of HAP emissions in lieu of establishing monthly HAP emission restrictions for the first year of operation.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) For purposes of calculating the organic compound emission rates for the associated ovens (P001-P007), the permittee shall collect and record the following information each day for emissions units R001-R008:
 - a. The company identification for each coating employed;
 - b. The number of gallons of each coating employed;
 - c. The OC content of each coating, in pounds per gallon; and
 - d. The OC emission rates (prior to applying a booth/oven split) from the paint booths, in pounds per day [summation of d)(1)b. x d)(1)c. for all coatings employed].

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

- (2) In order to demonstrate compliance with the 12-month, rolling OC emission limitation, the permittee shall collect and record the following information each month for emissions units P001-P007, R001-R008, K001-K005 and P801, combined:
- a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material, in pounds per gallon,
 - d. the OC emission rate [summation of d)(2)b. times d)(2)c. for all coatings and cleanup materials employed]; and
 - e. the rolling, 12-month summation, in tons, of the monthly OC emission rates.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

- (3) In order to demonstrate compliance with the 12-month, rolling HAP emission limitations, the permittee shall collect and record the following information each month for emissions units P001-P007, R001-R008, K001-K005 and P801, combined:
- a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon;
 - d. the emission rate, in pounds, for each individual HAP from each coating and cleanup material employed [d)(3)b. times d)(3)c.];
 - e. the total emission rate for each HAP from all coatings and cleanup materials employed [summation of d)(3)d. for each individual HAP], in pounds per month;
 - f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed [summation of d)(3)e.], in pounds per month;
 - g. the rolling, 12-month summation, in tons, of each individual HAP; and
 - h. the rolling, 12-month summation, in tons, of the combination of all HAPs.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

- (4) The FEPTIO application for these emissions unit(s), P001-P007, R001-R008, K001-K005, and P801 was evaluated based on the actual materials and the design parameters of the emissions units' 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 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., “X” hours per day and “Y” days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants or “worst case” toxic contaminant(s):

Toxic Contaminant: Cyclohexane w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 1,033 (*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 89.60 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 22,481

MAGLC (ug/m3): 24,587

The following summarizes the results of dispersion modeling for the significant toxic contaminants or "worst case" toxic contaminant(s):

Toxic Contaminant: Methyl N-propyl Ketone w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 705 (*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 36.35 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 9,121

MAGLC (ug/m3): 16,783

The following summarizes the results of dispersion modeling for the significant toxic contaminants or "worst case" toxic contaminant(s):

Toxic Contaminant: Methyl Isobutyl Ketone w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 205 (*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 2.05 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 515

MAGLC (ug/m3): 4,877

The following summarizes the results of dispersion modeling for the significant toxic contaminants or "worst case" toxic contaminant(s):

Toxic Contaminant: Toluene w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 188 (*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 4.52 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 496.5

MAGLC (ug/m3): 1794.28

The permittee, having demonstrated that emissions of cyclohexane, methyl N-propyl ketone and methyl isobutyl ketone, from emissions units P001-P007, R001-R008, K001-

K005, and P801 is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit(s) at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and 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).

- (5) 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", ORC 3704.03(F), 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 FEPTIO 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.

- (6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":
- 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.
- (7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The permittee shall submit 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.
 - (2) 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 OC; and
 - ii. all exceedances of the rolling, 12-month emission limitation for HAPs
 - 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.
 - (3) 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.

- (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.

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:

25.60 lbs OC/hr for each emissions unit R001-R008

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission unit's potential to emit*. Therefore, no hourly monitoring, recordkeeping, reporting or compliance method calculations are required to demonstrate compliance with the limitation.

*The potential to emit for this emissions unit was based on a maximum OC content of 6.4 lbs/gal and a maximum hourly usage rate of 4 gallon/hr. This emission limitation is based on a worst-case scenario that all OC emissions from the paint booth and its associated oven are emitted from the booth.

b. Emission Limitation:

Combined limits for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, R008, K001, K002, K003, K004, K005 and P801:

75.0 tons OC per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with the rolling, 12-month emission limitation in accordance with the record keeping requirements specified in d)(2).

c. Emission Limitation:

Combined limits for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, R008, K001, K002, K003, K004, K005 and P801:

9.9 tons individual HAP per rolling, 12-month period

24.9 tons combined HAPs per rolling, 12-month period

Draft Permit-to-Install and Operate

Alpha Coatings, Inc.

Permit Number: P0109740

Facility ID: 0374010217

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

The permittee shall demonstrate compliance with the rolling, 12-month emission limitation in accordance with the record keeping requirements specified in d)(3).

- (2) Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

g) Miscellaneous Requirements

- (1) None.