



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
MONTGOMERY COUNTY**

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 08-04867

Fac ID: 0857093330

DATE: 12/18/2007

Brainerd Industries Incorporated
Doug Russell
680 Precision Court
Miamisburg, OH 45342-6138

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

RAPCA



**Permit To Install
Terms and Conditions**

**Issue Date: 12/18/2007
Effective Date: 12/18/2007**

FINAL PERMIT TO INSTALL 08-04867

Application Number: 08-04867
Facility ID: 0857093330
Permit Fee: **\$2200**
Name of Facility: Brainerd Industries Incorporated
Person to Contact: Doug Russell
Address: 680 Precision Court
 Miamisburg, OH 45342-6138

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

**680 Precision Court
Miamisburg, Ohio**

Description of proposed emissions unit(s):

**Parts cleaning, 2 roll coaters and ovens, 8 silk screen presses and ovens, powder coat line,
and silk screen wash out station.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

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

Brainerd Industries Incorporated
PTI Application: 08-04867
Issued: 12/18/2007

Facility ID: 0857093330

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

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

Brainerd Industries Incorporated
PTI Application: 08-04867
Issued: 12/18/2007

Facility ID: 0857093330

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

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

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

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

Brainerd Industries Incorporated
PTI Application: 08-04867
Issued: 12/18/2007

Facility ID: 0857093330

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
organic compounds	60.09
Single HAP	9.9
Combined HAPs	24.9

7

Brainerd Industries Incorporated
PTI Application: 08-04867
Issued: 12/18/2007

Facility ID: 0857093330

Issued: 12/18/2007

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

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

Operations, Property, and/or Equipment - (K001) - roll coater and oven (metal parts)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The organic compound (OC) emissions shall not exceed 5.48 lbs/hour, including cleanup. See A.2.a.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(e)(i).</p>
OAC rule 3745-21-09(U)(2)(e)(i)	The coating usage rate shall be less than or equal to 8 gallons per day.
OAC 3745-31-05(C) (synthetic minor to avoid Title V and voluntary limits)	<p>The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.</p> <p>The organic compound (OC) emissions shall not exceed 87.68 lbs/day and 16.0 tons/year, including cleanup. See A.2.b.</p>
OAC rule 3745-114-01 and ORC 3704.03(F)	See section C.4.

2. Additional Terms and Conditions

- 2.a The 5.48 pound of OC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

Issued: 12/18/2007

- 2.b** The permittee has requested federally enforceable emissions restrictions to limit the daily and annual OC emissions to establish the PTE for this pollutant.

B. Operational Restrictions

1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
- 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 organic compound content of each coating and cleanup material, in pounds per gallon.
 - d. The total organic compound emission rate for all coatings and cleanup materials, in pounds per day.
2. The permittee shall calculate and record the total annual OC emissions from coatings and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].
3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, de minimis, permit exempt, and permit by rule air contaminant sources combined for the purpose of determining the HAP* emissions:
- a. The name and company identification of each coating material employed.
 - b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.
 - c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.

Emissions Unit ID: **K001**

- d. The number of gallons of each coating material employed.
- e. The name and company identification of each cleanup material employed.
- f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.
- g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.
- h. The number of gallons of each cleanup material employed.
- i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of (b x d) + (f x h)], in tons.
- j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of (i) x d) + (g x h)], in tons.
- k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year.
- l. The rolling 12-month summation of the total combined HAP emissions from all coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

4. The permit to install for emissions units K001 and K002 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted

Issued: 12/18/2007

1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m³): 204.83

Maximum Hourly Emission Rate (lbs/hr): 0.772

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 214.2

MAGLC (ug/m³): 4,876.8

Pollutant: xylene

TLV (mg/m³): 434.19

Maximum Hourly Emission Rate (lbs/hr): 0.386

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 107.1

MAGLC (ug/m³): 10,337.9

Pollutant: isophorone

TLV (mg/m³): 28.26

Maximum Hourly Emission Rate (lbs/hr): 0.772

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 214.2

MAGLC (ug/m³): 673.0

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

Emissions Unit ID: **K001**

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

D. Reporting Requirements

1. The permittee shall notify the Director (appropriate 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 8 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that included the following information when the emissions unit was in operation:
 - a. each day the OC emissions exceeded the daily emissions limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day; and
 - b. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

3. The permittee shall submit annual reports to the Director (the appropriate District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.
4. The permittee shall submit annual reports which specify the total tons per year of the individual HAP emissions from emissions units K001, K002, R001 - R009, de minimis, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

E. Testing Requirements

Issued: 12/18/2007

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

a. Emission Limitation -

The coating usage shall be less than or equal to 8 gallons per day.

Applicable Compliance Method -

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

b. Emission Limitation-

The organic compound (OC) emissions from this emissions unit shall not exceed 5.48 lb/hr.

Applicable Compliance Method-

Compliance shall be determined by summation of the following:

i. multiplying the maximum coating usage rate of 0.375 gal/hour multiplied by the coating OC content of 7.08 lb-OC/gal,

ii. multiplying the maximum cleanup material 0.375 gal/hour multiplied by the cleanup OC content of 7.53 lb-OC/gal.

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

c. Emission Limitation -

The OC emissions shall not exceed 87.68 lb/day OC, including cleanup

Applicable Compliance Method -

Compliance shall be determined by record keeping requirements specified in Section C.1. of this permit.

d. Emission Limitation -

The OC emissions shall not exceed 16.0 TPY OC, including cleanup

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit and shall be the summation of the daily OC emission

Issued: 12/18/2007

rates.

- e. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

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

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K002) - Black Brothers roll coater and oven (metal parts)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The organic compound (OC) emissions shall not exceed 5.48 lbs/hour, including cleanup. See A.2.a.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(e)(i).</p>
OAC rule 3745-21-09(U)(2)(e)(i)	The coating usage rate shall be less than or equal to 8 gallons per day.
OAC 3745-31-05(C) (synthetic minor to avoid Title V and voluntary limits)	<p>The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, deminimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.</p> <p>The organic compound (OC) emissions shall not exceed 87.68 lbs/day and 16.0 tons/year, including cleanup. See A.2.b.</p>
OAC rule 3745-114-01 and ORC 3704.03(F)	See section C.4.

2. Additional Terms and Conditions

- 2.a The 5.48 pound of OC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b The permittee has requested federally enforceable emissions restrictions to limit

Issued: 12/18/2007

the daily and annual OC emissions to establish the PTE for this pollutant.

B. Operational Restrictions

1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 organic compound content of each coating and cleanup material, in pounds per gallon.
 - d. The total organic compound emission rate for all coatings and cleanup materials, in pounds per day.
2. The permittee shall calculate and record the total annual OC emissions from coatings and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].
3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, de minimis, permit exempt, and permit by rule air contaminant sources combined for the purpose of determining the HAP^{*} emissions:
 - a. The name and company identification of each coating material employed.
 - b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.
 - c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.
 - d. The number of gallons of each coating material employed.

Emissions Unit ID: **K002**

- e. The name and company identification of each cleanup material employed.
- f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.
- g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.
- h. The number of gallons of each cleanup material employed.
- i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of (b x d) + (f x h)], in tons.
- j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of (i) x d) + (g x h), in tons.
- k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year.
- l. The rolling 12-month summation of the total combined HAP emissions from all coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

- 4. The permit to install for emissions units K001 and K002 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0

Issued: 12/18/2007

(or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m³): 204.83

Maximum Hourly Emission Rate (lbs/hr): 0.772

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 214.2

MAGLC (ug/m³): 4,876.8

Pollutant: xylene

TLV (mg/m³): 434.19

Maximum Hourly Emission Rate (lbs/hr): 0.386

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 107.1

MAGLC (ug/m³): 10,337.9

Pollutant: isophorone

TLV (mg/m³): 28.26

Maximum Hourly Emission Rate (lbs/hr): 0.772

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 214.2

MAGLC (ug/m³): 673.0

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

Emissions Unit ID: **K002**

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

D. Reporting Requirements

1. The permittee shall notify the Director (appropriate 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 8 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that included the following information when the emissions unit was in operation:
 - a. each day the OC emissions exceeded the daily emissions limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day; and
 - b. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

3. The permittee shall submit annual reports to the Director (the appropriate District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.
4. The permittee shall submit annual reports which specify the total tons per year of the individual HAP emissions from emissions units K001, K002, R001 - R009, de minimis, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be

Issued: 12/18/2007

demonstrated in accordance with the following methods:

- a. Emission Limitation -
The coating usage shall be less than or equal to 8 gallons per day.

Applicable Compliance Method -
Compliance shall be based upon the coating usage record keeping requirements specified in C.1. of this permit.

- b. Emission Limitation-
The organic compound (OC) emissions from this emissions unit shall not exceed 5.48 lb/hr.

Applicable Compliance Method-
Compliance shall be determined by summation of the following:

- i. multiplying the maximum coating usage rate of 0.375 gal/hour multiplied by the coating OC content of 7.08 lb-OC/gal,
- ii. multiplying the maximum cleanup material 0.375 gal/hour multiplied by the cleanup OC content of 7.53 lb-OC/gal.

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

- c. Emission Limitation -
The OC emissions shall not exceed 87.68 lb/day OC, including cleanup

Applicable Compliance Method -
Compliance shall be determined by record keeping requirements specified in Section C.1. of this permit.

- d. Emission Limitation -
The OC emissions shall not exceed 16.0 TPY OC, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit and shall be the summation of the daily OC emission rates.

Issued: 12/18/2007

- e. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

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

F. Miscellaneous Requirements

None

Emissions Unit ID: **R001**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (R001) - parts wiping

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See A.2.a.
OAC rule 3745-21-07(G)(2)	The organic compounds (OC) shall not exceed 8 lb/hour and 40 lb/day, including both coatings and cleanup materials.
OAC 3745-31-05(C) (synthetic minor to avoid Title V)	The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.
OAC rule 3745-114-01 and 3704.03(F)	See section C.4.

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compounds (OC) from this air contaminant source since the uncontrolled potential to emit for OC is less than ten tons per year.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:

Issued: 12/18/2007

- a. the company identification for each coating cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the organic compound content of each coating and cleanup material, in pounds per gallon;
 - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
2. The permittee shall calculate and record the total annual OC emissions from coatings and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].
3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined for the purpose of determining the HAP^{*} emissions:
- a. The name and company identification of each coating material employed.
 - b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.
 - c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.
 - d. The number of gallons of each coating material employed.
 - e. The name and company identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.

Emissions Unit ID: **R001**

- g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.
- h. The number of gallons of each cleanup material employed.
- i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of (b x d) + (f x h)], in tons.
- j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of (c x d) + (g x h)], in tons.
- k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year.
- l. The rolling 12-month summation of the total combined HAP emissions from all coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

- 4. The permit to install for emissions units R001 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hexane
TLV (mg/m³): 176.24

Issued: 12/18/2007

Maximum Hourly Emission Rate (lbs/hr): 0.243

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 504.5

MAGLC (ug/m3): 4,196.1

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information when the unit was in operation:
 - a. an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded the hourly limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day;
 - b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded daily limit specified in Section A.1. above, and the actual organic compound emissions for each such day; and

Emissions Unit ID: R001

- c. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.
3. The permittee shall submit annual reports which specify the total tons per year of the individual HAP emissions from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

Issued: 12/18/2007

E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission Limitation -
The organic compound (OC) emissions shall not exceed 0.37 lbs/hour and 8.88 lbs/day OC for the coatings and cleanup materials

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in section C.1 of this permit.

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

- b. Emission Limitation -
The organic compound (OC) emissions shall not exceed 1.62 tons/year coatings and cleanup materials

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in section C.2 of this permit.

- c. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit and shall be the summation of the monthly OC emission rates.

F. Miscellaneous Requirements

None

Issued: 12/18/2007

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

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

Operations, Property, and/or Equipment - (R002) - silk screen printing press and oven (metal and plastic parts)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (voluntary limits and synthetic minor to avoid Title V)	The organic compounds (OC) shall not exceed 2.74 tons/year, including both coatings and cleanup materials. See A.2.a below. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.
OAC rule 3745-21-07(G)(1)	The organic compounds (OC) shall not exceed 3 lb/hour and 15 lb/day, including both coatings and cleanup when using organic material or substance containing liquid organic material comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. See A.2.b.
OAC rule 3745-21-07(G)(2)	The organic compounds (OC) shall not exceed 8 lb/hour and 40 lb/day, including both coatings and cleanup materials. See A.2.b.
OAC rule 3745-21-09(U)(2)(e)(i)	The coating usage shall be less than or equal to 8 gallons per day. See A.2.b.
ORC 3704.03(T)(4)	See A.2.c.

2. Additional Terms and Conditions

- 2.a** The permittee shall at all times comply with the 2.74 tons/year OC annual

Emissions Unit ID: R002

limitation as established in OAC rule 3745-31-05(C). This is equivalent to OAC rule 3745-21-07(G)(1) and more stringent than the emission limitations established pursuant to OAC rules 3745-21-07(G)(2) and 3745-21-09(U)(2)(e)(i).

- 2.b** By limiting emissions to the more restrictive emissions limitations of OAC rule 3745-21-07(G)(1) when coating either plastic or metal parts, including the 8 gal/day coating usage limitation, and specifying hourly monitoring and record keeping, it was determined that all of the record keeping could be combined and separate recordkeeping would not be necessary when using heat-cured versus non heat-cured materials.
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compounds (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC is less than ten tons per year.

B. Operational Restrictions

1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 organic compound content of each coating cleanup material, in pounds per gallon;
 - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
2. The permittee shall calculate and record the total annual OC emissions from coatings

Issued: 12/18/2007

and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].

3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined for the purpose of determining the HAP^{*} emissions:
 - a. The name and company identification of each coating material employed.
 - b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.
 - c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.
 - d. The number of gallons of each coating material employed.
 - e. The name and company identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.
 - g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.
 - h. The number of gallons of each cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of (b x d) + (f x h)], in tons.
 - j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of (c x d) + (g x h)], in tons.
 - k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year.

Emissions Unit ID: **R002**

- I. The rolling 12-month summation of the total combined HAP emissions from all coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

D. Reporting Requirements

1. The permittee shall notify the Director (appropriate 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 8 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.
12. The permittee shall submit quarterly deviation (excursion) reports that include the following information when the unit was in operation:
 - a. an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded the hourly limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day;
 - b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded daily limit specified in Section A.1. above, and the actual organic compound emissions for each such day; and
 - c. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

23. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this

Issued: 12/18/2007

emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

34. The permittee shall submit annual reports which specify the total tons per year of the individual HAP emissions from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission Limitation -
The coating usage shall be less than or equal to 8 gallons per day.

Applicable Compliance Method -
Compliance shall be based upon the coating usage record keeping requirements specified in C.1 of this permit.

- b. Emission Limitation -
The organic compound (OC) emissions shall not exceed 3 lbs/hour and 15 lbs/day OC for the coatings and cleanup materials

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in section C.1 of this permit.

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

- c. The OC shall not exceed 2.74 tons/year, including both coatings and cleanup materials.

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in section C.2 of this permit.

Emissions Unit ID: **R002**

- d. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

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

F. Miscellaneous Requirements

None

Issued: 12/18/2007

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

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

Operations, Property, and/or Equipment - (R003) - Svecia silk screen printing press and oven (metal and plastic parts)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (voluntary limits and synthetic minor to avoid Title V)	The organic compounds (OC) shall not exceed 2.74 tons/year, including both coatings and cleanup materials. See A.2.a below. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.
OAC rule 3745-21-07(G)(1)	The organic compounds (OC) shall not exceed 3 lb/hour and 15 lb/day, including both coatings and cleanup when using organic material or substance containing liquid organic material comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. See A.2.b.
OAC rule 3745-21-07(G)(2)	The organic compounds (OC) shall not exceed 8 lb/hour and 40 lb/day, including both coatings and cleanup materials. See A.2.b.
OAC rule 3745-21-09(U)(2)(e)(i)	The coating usage shall be less than or equal to 8 gallons per day. See A.2.b.
ORC 3704.03(T)(4)	See A.2.c.

2. Additional Terms and Conditions

Issued: 12/18/2007

- 2.a** The permittee shall at all times comply with the 2.74 tons/year OC annual limitation as established in OAC rule 3745-31-05(C). This is equivalent to 3745-21-07(G)(1) and more stringent than the emission limitations established pursuant to OAC rules 3745-21-07(G)(2) and 3745-21-09(U)(2)(e)(i).
- 2.b** By limiting emissions to the more restrictive emissions limitations of OAC rule 3745-21-07(G)(1) when coating either plastic or metal parts, including the 8 gal/day coating usage limitation, and specifying hourly monitoring and record keeping, it was determined that all of the record keeping could be combined and separate recordkeeping would not be necessary when using heat-cured versus non heat-cured materials.
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compounds (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC is less than ten tons per year.

B. Operational Restrictions

- 1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 organic compound content of each coating cleanup material, in pounds per gallon;
 - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

Emissions Unit ID: **R003**

2. The permittee shall calculate and record the total annual OC emissions from coatings and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].
3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined for the purpose of determining the HAP⁷ emissions:
 - a. The name and company identification of each coating material employed.
 - b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.
 - c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.
 - d. The number of gallons of each coating material employed.
 - e. The name and company identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.
 - g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.
 - h. The number of gallons of each cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of (b x d) + (f x h)], in tons.
 - j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of (c x d) + (g x h)], in tons.
 - k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year.

Issued: 12/18/2007

- I. The rolling 12-month summation of the total combined HAP emissions from all coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

Issued: 12/18/2007**D. Reporting Requirements**

1. The permittee shall notify the Director (appropriate 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 8 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.
12. The permittee shall submit quarterly deviation (excursion) reports that include the following information when the unit was in operation:
 - a. an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded the hourly limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day;
 - b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded daily limit specified in Section A.1. above, and the actual organic compound emissions for each such day; and
 - c. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

23. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.
34. The permittee shall submit annual reports which specify the total tons per year of the individual HAP emissions from emissions units K001, K002, R001 - R009, deminimus, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

E. Testing Requirements

Emissions Unit ID: R003

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
 - a. Emission Limitation -
The coating usage shall be less than or equal to 8 gallons per day.

Applicable Compliance Method -
Compliance shall be based upon the coating usage record keeping requirements specified in C.1 of this permit.
 - b. Emission Limitation -
The organic compound (OC) emissions shall not exceed 3 lbs/hour and 15 lbs/day OC for the coatings and cleanup materials

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in section C.1 of this permit.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, of 40 CFR, Part 60, Appendix A.
 - c. The OC shall not exceed 2.74 tons/year, including both coatings and cleanup materials.

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in section C.2 of this permit.
 - d. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.
2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler

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Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren, and Wood Counties shall use Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

E. Testing Requirements

None

F. Miscellaneous Requirements

None

Issued: 12/18/2007

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

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

Operations, Property, and/or Equipment - (R004) - Svecia silk screen printing press and combi-oven (metal and plastic parts)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (voluntary limits and synthetic minor to avoid Title V)	The organic compounds (OC) shall not exceed 2.74 tons/year, including both coatings and cleanup materials. See A.2.a below. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.
OAC rule 3745-21-07(G)(1)	The organic compounds (OC) shall not exceed 3 lb/hour and 15 lb/day, including both coatings and cleanup when using organic material or substance containing liquid organic material comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. See A.2.b.
OAC rule 3745-21-07(G)(2)	The organic compounds (OC) shall not exceed 8 lb/hour and 40 lb/day, including both coatings and cleanup materials. See A.2.b.
OAC rule 3745-21-09(U)(2)(e)(i)	The coating usage shall be less than or equal to 8 gallons per day. See A.2.b.
ORC 3704.03(T)(4)	See A.2.c.

2. Additional Terms and Conditions

Emissions Unit ID: **R004**

- 2.a** The permittee shall at all times comply with the 2.74 tons/year OC annual limitation as established in OAC rule 3745-31-05(C). This is equivalent to 3745-21-07(G)(1) and more stringent than the emission limitations established pursuant to OAC rules 3745-21-07(G)(2) and 3745-21-09(U)(2)(e)(i).
- 2.b** By limiting emissions to the more restrictive emissions limitations of OAC rule 3745-21-07(G)(1) when coating either plastic or metal parts, including the 8 gal/day coating usage limitation, and specifying hourly monitoring and record keeping, it was determined that all of the record keeping could be combined and separate recordkeeping would not be necessary when using heat-cured versus non heat-cured materials.
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compounds (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC is less than ten tons per year.

B. Operational Restrictions

1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 organic compound content of each coating cleanup material, in pounds per gallon;
 - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

Issued: 12/18/2007

2. The permittee shall calculate and record the total annual OC emissions from coatings and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].
3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined for the purpose of determining the HAP^{*} emissions:
 - a. The name and company identification of each coating material employed.
 - b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.
 - c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.
 - d. The number of gallons of each coating material employed.
 - e. The name and company identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.
 - g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.
 - h. The number of gallons of each cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of (b x d) + (f x h)], in tons.
 - j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of (c x d) + (g x h)], in tons.
 - k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year.

Emissions Unit ID: R004

- I. The rolling 12-month summation of the total combined HAP emissions from all coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

Issued: 12/18/2007

D. Reporting Requirements

1. The permittee shall notify the Director (appropriate 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 8 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.
12. The permittee shall submit quarterly deviation (excursion) reports that include the following information when the unit was in operation:
 - a. an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded the hourly limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day;
 - b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded daily limit specified in Section A.1. above, and the actual organic compound emissions for each such day; and
 - c. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

23. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.
34. The permittee shall submit annual reports which specify the total tons per year of the individual HAP emissions from emissions units K001, K002, R001 - R009, deminimus, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

E. Testing Requirements

Issued: 12/18/2007

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission Limitation -
The coating usage shall be less than or equal to 8 gallons per day.

Applicable Compliance Method -
Compliance shall be based upon the coating usage record keeping requirements specified in C.1 of this permit.

- b. Emission Limitation -
The organic compound (OC) emissions shall not exceed 3 lbs/hour and 15 lbs/day OC for the coatings and cleanup materials

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in section C.1 of this permit.

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

- c. The OC shall not exceed 2.74 tons/year, including both coatings and cleanup materials.

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in section C.2 of this permit.

- d. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

Brainerd Industries Incorporated

DTI Application: 08 04867

Facility ID: 0857093330Emissions Unit ID: **R004**

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

E. Testing Requirements

None

F. Miscellaneous Requirements

None

Issued: 12/18/2007

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

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

Operations, Property, and/or Equipment - (R005) - Svecia silk screen printing press and electric oven (metal and plastic parts)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (voluntary limits and synthetic minor to avoid Title V)	The organic compounds (OC) shall not exceed 2.74 tons/year, including both coatings and cleanup materials. See A.2.a below. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.
OAC rule 3745-21-07(G)(1)	The organic compounds (OC) shall not exceed 3 lb/hour and 15 lb/day, including both coatings and cleanup when using organic material or substance containing liquid organic material comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. See A.2.b.
OAC rule 3745-21-07(G)(2)	The organic compounds (OC) shall not exceed 8 lb/hour and 40 lb/day, including both coatings and cleanup materials. See A.2.b.
OAC rule 3745-21-09(U)(2)(e)(i)	The coating usage shall be less than or equal to 8 gallons per day. See A.2.b.
ORC 3704.03(T)(4)	See A.2.c.

2. Additional Terms and Conditions

Emissions Unit ID: **R005**

- 2.a** The permittee shall at all times comply with the 2.74 tons/year OC annual limitation as established in OAC rule 3745-31-05(C). This is equivalent to 3745-21-07(G)(1) and more stringent than the emission limitations established pursuant to OAC rules 3745-21-07(G)(2) and 3745-21-09(U)(2)(e)(i).
- 2.b** By limiting emissions to the more restrictive emissions limitations of OAC rule 3745-21-07(G)(1) when coating either plastic or metal parts, including the 8 gal/day coating usage limitation, and specifying hourly monitoring and record keeping, it was determined that all of the record keeping could be combined and separate recordkeeping would not be necessary when using heat-cured versus non heat-cured materials.
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compounds (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC is less than ten tons per year.

B. Operational Restrictions

1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 organic compound content of each coating cleanup material, in pounds per gallon;
 - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

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2. The permittee shall calculate and record the total annual OC emissions from coatings and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].
3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined for the purpose of determining the HAP^{*} emissions:
 - a. The name and company identification of each coating material employed.
 - b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.
 - c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.
 - d. The number of gallons of each coating material employed.
 - e. The name and company identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.
 - g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.
 - h. The number of gallons of each cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of (b x d) + (f x h)], in tons.
 - j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of (c x d) + (g x h)], in tons.
 - k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year.

Issued: 12/18/2007

- I. The rolling 12-month summation of the total combined HAP emissions from all coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

D. Reporting Requirements

1. The permittee shall notify the Director (appropriate 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 8 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.
12. The permittee shall submit quarterly deviation (excursion) reports that include the following information when the unit was in operation:
 - a. an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded the hourly limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day;
 - b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded daily limit specified in Section A.1. above, and the actual organic compound emissions for each such day; and
 - c. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

23. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.
34. The permittee shall submit annual reports which specify the total tons per year of the individual HAP emissions from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

E. Testing Requirements

Issued: 12/18/2007

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

a. Emission Limitation -
The coating usage shall be less than or equal to 8 gallons per day.

Applicable Compliance Method -
Compliance shall be based upon the coating usage record keeping requirements specified in C.1 of this permit.

b. Emission Limitation -
The organic compound (OC) emissions shall not exceed 3 lbs/hour and 15 lbs/day OC for the coatings and cleanup materials

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in section C.1 of this permit.

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

c. The OC shall not exceed 2.74 tons/year, including both coatings and cleanup materials.

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in section C.2 of this permit.

d. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler

Issued: 12/18/2007

Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren, and Wood Counties shall use Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (R006) - Svecia silk screen printing press and electric oven (metal and plastic parts)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (voluntary limits and synthetic minor to avoid Title V)	<p>The organic compounds (OC) shall not exceed 2.74 tons/year, including both coatings and cleanup materials. See A.2.a below.</p> <p>The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.</p>
OAC rule 3745-21-07(G)(1)	The organic compounds (OC) shall not exceed 3 lb/hour and 15 lb/day, including both coatings and cleanup when using organic material or substance containing liquid organic material comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. See A.2.b.
OAC rule 3745-21-07(G)(2)	The organic compounds (OC) shall not exceed 8 lb/hour and 40 lb/day, including both coatings and cleanup materials. See A.2.b.
OAC rule 3745-21-09(U)(2)(e)(i)	The coating usage shall be less than or equal to 8 gallons per day. See A.2.b.
ORC 3704.03(T)(4)	See A.2.c.

2. Additional Terms and Conditions

- 2.a The permittee shall at all times comply with the 2.74 tons/year OC annual limitation as established in OAC rule 3745-31-05(C). This is equivalent to

Issued: 12/18/2007

3745-21-07(G)(1) and more stringent than the emission limitations established pursuant to OAC rules 3745-21-07(G)(2) and 3745-21-09(U)(2)(e)(i).

- 2.b** By limiting emissions to the more restrictive emissions limitations of OAC rule 3745-21-07(G)(1) when coating either plastic or metal parts, including the 8 gal/day coating usage limitation, and specifying hourly monitoring and record keeping, it was determined that all of the record keeping could be combined and separate recordkeeping would not be necessary when using heat-cured versus non heat-cured materials.
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compounds (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC is less than ten tons per year.

B. Operational Restrictions

- 1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 organic compound content of each coating cleanup material, in pounds per gallon;
 - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
- 2. The permittee shall calculate and record the total annual OC emissions from coatings

Issued: 12/18/2007

and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].

3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined for the purpose of determining the HAP^{*} emissions:
 - a. The name and company identification of each coating material employed.
 - b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.
 - c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.
 - d. The number of gallons of each coating material employed.
 - e. The name and company identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.
 - g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.
 - h. The number of gallons of each cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of (b x d) + (f x h)], in tons.
 - j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of (c x d) + (g x h)], in tons.
 - k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year.

Emissions Unit ID: **R006**

- I. The rolling 12-month summation of the total combined HAP emissions from all coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

Issued: 12/18/2007**D. Reporting Requirements**

1. The permittee shall notify the Director (appropriate 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 8 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.
12. The permittee shall submit quarterly deviation (excursion) reports that include the following information when the unit was in operation:
 - a. an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded the hourly limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day;
 - b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded daily limit specified in Section A.1. above, and the actual organic compound emissions for each such day; and
 - c. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

23. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.
34. The permittee shall submit annual reports which specify the total tons per year of the individual HAP emissions from emissions units K001, K002, R001 - R009, deminimus, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

E. Testing Requirements

Emissions Unit ID: R006

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
 - a. Emission Limitation -
The coating usage shall be less than or equal to 8 gallons per day.

Applicable Compliance Method -
Compliance shall be based upon the coating usage record keeping requirements specified in C.1 of this permit.
 - b. Emission Limitation -
The organic compound (OC) emissions shall not exceed 3 lbs/hour and 15 lbs/day OC for the coatings and cleanup materials

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in section C.1 of this permit.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, of 40 CFR, Part 60, Appendix A.
 - c. The OC shall not exceed 2.74 tons/year, including both coatings and cleanup materials.

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in section C.2 of this permit.
 - d. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.
2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler

Issued: 12/18/2007

Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren, and Wood Counties shall use Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

None

Issued: 12/18/2007

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

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

Operations, Property, and/or Equipment - (R007) - Svecia silk screen printing press and UV oven (metal parts)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (voluntary limits and synthetic minor to avoid Title V)	The organic compounds (OC) shall not exceed 7.3 tons/year, including both coatings and cleanup materials. See A.2.a below. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.
OAC rule 3745-21-07(G)(2)	The organic compounds (OC) shall not exceed 8 lb/hour and 40 lb/day, including both coatings and cleanup materials. See A.2.b.
OAC rule 3745-21-09(U)(2)(e)(i)	The coating usage shall be less than or equal to 8 gallons per day. See A.2.b.
ORC 3704.03(T)(4)	See A.2.c.

2. Additional Terms and Conditions

- 2.a The permittee shall at all times comply with the 7.3 tons/year OC annual limitation as established in OAC rule 3745-31-05(C). This is equivalent to 3745-21-07(G)(2) and more stringent than the emission limitations established pursuant to OAC rule 3745-21-09(U)(2)(e)(i).
- 2.b By limiting emissions to the more restrictive emissions limitations of OAC rule

Emissions Unit ID: R007

3745-21-07(G)(2) when coating either plastic or metal parts, including the 8 gal/day coating use the limitation, and specifying hourly monitoring and record keeping, it was determined that all of the record keeping could be combined and separate recordkeeping would not be necessary.

- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compounds (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC is less than ten tons per year taking into account the federally enforceable rule limit of 40 lb/day OC under OAC rule 3745-21-07(G)(2).

B. Operational Restrictions

1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 organic compound content of each coating cleanup material, in pounds per gallon;
 - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
2. The permittee shall calculate and record the total annual OC emissions from coatings and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].
3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by

Issued: 12/18/2007

rule air contaminant sources combined for the purpose of determining the HAP* emissions:

- a. The name and company identification of each coating material employed.
- b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.
- c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.
- d. The number of gallons of each coating material employed.
- e. The name and company identification of each cleanup material employed.
- f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.
- g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.
- h. The number of gallons of each cleanup material employed.
- i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of $(b \times d) + (f \times h)$], in tons.
- j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of $(c \times d) + (g \times h)$], in tons.
- k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year.
- l. The rolling 12-month summation of the total combined HAP emissions from all coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air

Issued: 12/18/2007

Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

D. Reporting Requirements

1. The permittee shall notify the Director (appropriate 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 8 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.

12. The permittee shall submit quarterly deviation (excursion) reports that include the following information when the unit was in operation:
 - a. an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded the hourly limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day;
 - b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded daily limit specified in Section A.1. above, and the actual organic compound emissions for each such day; and
 - c. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

23. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

34. The permittee shall submit annual reports which specify the total tons per year of the

Emissions Unit ID: **R007**

individual HAP emissions from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission Limitation -

The coating usage shall be less than or equal to 8 gallons per day.

Applicable Compliance Method -

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

- b. Emission Limitation -

The organic compound (OC) emissions shall not exceed 8 lbs/hour and 40 lbs/day OC for the coatings and cleanup materials

Applicable Compliance Method -

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

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

- c. The OC shall not exceed 2.74 tons/year, including both coatings and cleanup materials.

Applicable Compliance Method -

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

- d. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Issued: 12/18/2007

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

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

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (R008) - Cameo Saturn silk screen printing press and oven (metal and plastic parts)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (voluntary limits and synthetic minor to avoid Title V)	<p>The organic compounds (OC) shall not exceed 2.74 tons/year, including both coatings and cleanup materials. See A.2.a below.</p> <p>The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.</p>
OAC rule 3745-21-07(G)(1)	The organic compounds (OC) shall not exceed 3 lb/hour and 15 lb/day, including both coatings and cleanup when using organic material or substance containing liquid organic material comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. See A.2.b.
OAC rule 3745-21-07(G)(2)	The organic compounds (OC) shall not exceed 8 lb/hour and 40 lb/day, including both coatings and cleanup materials. See A.2.b.
OAC rule 3745-21-09(U)(2)(e)(i)	The coating usage shall be less than or equal to 8 gallons per day. See A.2.b.
ORC 3704.03(T)(4)	See A.2.c.

2. Additional Terms and Conditions

- 2.a The permittee shall at all times comply with the 2.74 tons/year OC annual limitation as established in OAC rule 3745-31-05(C). This is equivalent to

Issued: 12/18/2007

3745-21-07(G)(1) and more stringent than the emission limitations established pursuant to OAC rules 3745-21-07(G)(2) and 3745-21-09(U)(2)(e)(i).

- 2.b** By limiting emissions to the more restrictive emissions limitations of OAC rule 3745-21-07(G)(1) when coating either plastic or metal parts, including the 8 gal/day coating usage limitation, and specifying hourly monitoring and record keeping, it was determined that all of the record keeping could be combined and separate recordkeeping would not be necessary when using heat-cured versus non heat-cured materials.
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compounds (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC is less than ten tons per year.

B. Operational Restrictions

- 1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 organic compound content of each coating cleanup material, in pounds per gallon;
 - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
- 2. The permittee shall calculate and record the total annual OC emissions from coatings

Issued: 12/18/2007

and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].

3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined for the purpose of determining the HAP^{*} emissions:
 - a. The name and company identification of each coating material employed.
 - b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.
 - c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.
 - d. The number of gallons of each coating material employed.
 - e. The name and company identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.
 - g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.
 - h. The number of gallons of each cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of $(b \times d) + (f \times h)$], in tons.
 - j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of $(c \times d) + (g \times h)$], in tons.
 - k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year.

Emissions Unit ID: **R008**

- I. The rolling 12-month summation of the total combined HAP emissions from all coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

Issued: 12/18/2007

D. Reporting Requirements

1. The permittee shall notify the Director (appropriate 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 8 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.

12. The permittee shall submit quarterly deviation (excursion) reports that include the following information when the unit was in operation:
 - a. an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded the hourly limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day;
 - b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded daily limit specified in Section A.1. above, and the actual organic compound emissions for each such day; and
 - c. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

23. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

34. The permittee shall submit annual reports which specify the total tons per year of the individual HAP emissions from emissions units K001, K002, R001 - R009, deminimus, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

E. Testing Requirements

Emissions Unit ID: R008

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
 - a. Emission Limitation -
The coating usage shall be less than or equal to 8 gallons per day.

Applicable Compliance Method -
Compliance shall be based upon the coating usage record keeping requirements specified in C.1 of this permit.
 - b. Emission Limitation -
The organic compound (OC) emissions shall not exceed 3 lbs/hour and 15 lbs/day OC for the coatings and cleanup materials

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in section C.1 of this permit.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, of 40 CFR, Part 60, Appendix A.
 - c. The OC shall not exceed 2.74 tons/year, including both coatings and cleanup materials.

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in section C.2 of this permit.
 - d. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.
2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler

Issued: 12/18/2007

Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren, and Wood Counties shall use Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

None

Issued: 12/18/2007

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

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

Operations, Property, and/or Equipment - (R009) - Renegade Saturn silk screen printing press and oven (metal and plastic parts)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (voluntary limits and synthetic minor to avoid Title V)	The organic compounds (OC) shall not exceed 2.74 tons/year, including both coatings and cleanup materials. See A.2.a below. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.
OAC rule 3745-21-07(G)(1)	The organic compounds (OC) shall not exceed 3 lb/hour and 15 lb/day, including both coatings and cleanup when using organic material or substance containing liquid organic material comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. See A.2.b.
OAC rule 3745-21-07(G)(2)	The organic compounds (OC) shall not exceed 8 lb/hour and 40 lb/day, including both coatings and cleanup materials. See A.2.b.
OAC rule 3745-21-09(U)(2)(e)(i)	The coating usage shall be less than or equal to 8 gallons per day. See A.2.b.
ORC 3704.03(T)(4)	See A.2.c.

2. Additional Terms and Conditions

Emissions Unit ID: **R009**

- 2.a** The permittee shall at all times comply with the 2.74 tons/year OC annual limitation as established in OAC rule 3745-31-05(C). This is equivalent to 3745-21-07(G)(1) and more stringent than the emission limitations established pursuant to OAC rules 3745-21-07(G)(2) and 3745-21-09(U)(2)(e)(i).
- 2.b** By limiting emissions to the more restrictive emissions limitations of OAC rule 3745-21-07(G)(1) when coating either plastic or metal parts, including the 8 gal/day coating usage limitation, and specifying hourly monitoring and record keeping, it was determined that all of the record keeping could be combined and separate recordkeeping would not be necessary when using heat-cured versus non heat-cured materials.
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compounds (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC is less than ten tons per year.

B. Operational Restrictions

1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 organic compound content of each coating cleanup material, in pounds per gallon;
 - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

Issued: 12/18/2007

2. The permittee shall calculate and record the total annual OC emissions from coatings and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.1.d].
3. The permittee shall collect and record the following information for each month for emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined for the purpose of determining the HAP^{*} emissions:
 - a. The name and company identification of each coating material employed.
 - b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied.
 - c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied.
 - d. The number of gallons of each coating material employed.
 - e. The name and company identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied.
 - g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied.
 - h. The number of gallons of each cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of (b x d) + (f x h)], in tons.
 - j. The total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of (c x d) + (g x h)], in tons.
 - k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year.

Issued: 12/18/2007

- I. The rolling 12-month summation of the total combined HAP emissions from all coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

D. Reporting Requirements

1. The permittee shall notify the Director (appropriate 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 8 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.
12. The permittee shall submit quarterly deviation (excursion) reports that include the following information when the unit was in operation:
 - a. an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded the hourly limit specified in Section A.1. above, and the actual average hourly organic compound emissions for each such day;
 - b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded daily limit specified in Section A.1. above, and the actual organic compound emissions for each such day; and
 - c. any exceedances of the HAPs emission limits specified in Section A.1. above.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

23. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.
34. The permittee shall submit annual reports which specify the total tons per year of the individual HAP emissions from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources, and the and combined HAPs emissions from these emission units. These reports shall be submitted by April 15 of each year and shall cover for the previous calendar year.

E. Testing Requirements

Issued: 12/18/2007

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

a. Emission Limitation -
The coating usage shall be less than or equal to 8 gallons per day.

Applicable Compliance Method -
Compliance shall be based upon the coating usage record keeping requirements specified in C.1 of this permit.

b. Emission Limitation -
The organic compound (OC) emissions shall not exceed 3 lbs/hour and 15 lbs/day OC for the coatings and cleanup materials

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in section C.1 of this permit.

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

c. The OC shall not exceed 2.74 tons/year, including both coatings and cleanup materials.

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in section C.2 of this permit.

d. The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, R001 - R009, de minimus, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler

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Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren, and Wood Counties shall use Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

E. Testing Requirements

None

F. Miscellaneous Requirements

None