Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

10/30/2012

Certified Mail

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

Jennifer McGuckin
D.S. BROWN CO
300 E. CHERRY ST
NORTH BALTIMORE, OH 45872

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0387000118
Permit Number: P0111461
Permit Type: OAC Chapter 3745-31 Modification
County: Wood

Dear Permit Holder:

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

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

and

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

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

Sincerely,

Michael W. Ahern

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

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

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   Netting Determination

2. Source Description:

   D.S. Brown Co is proposing a modification of emissions units K004 (Plate Coating Area), K005 (Shim Dip Coating Line) to increase paint usage and L001 (Cold Cleaner Dip Tank) to increase solvent usage. The emissions units were issued a renewal synthetic minor permit (P0087865, issued 10/26/11) that established federally enforceable restrictions for emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAPs). This modification will result in an increase of VOC emissions but maintain the current HAPs emissions limitations. In addition, the facility is requesting that K003 (Shim Coating Area) be permanently shutdown. Emissions units K001, K002 and P001-P003 are not addressed in this permit and will maintain their current emission limitations.

3. Facility Emissions and Attainment Status:

   This modification does not alter the original synthetic minor determination regarding facility emissions and attainment status. D.S. Brown Co is located in Wood County and is considered a synthetic minor facility for Title V and MACT purposes. Wood County is in attainment for all criteria pollutants. The company is requesting that this modification keep the appropriate federally enforceable requirements in place to continue to avoid Title V and MACT permitting requirements.

4. Source Emissions:

   While this modification allows for an increase in VOC emissions, D.S. Co requested federally enforceable limitations to restrict the potential to emit for VOCs and HAPs such that the facility PTE would be below Title V and MACT major source thresholds. The company has proposed to change operational restrictions previously established in P0087865. Emissions unit K004 has an operational restriction of 1000 gallons coating applied on an annual basis based upon a rolling, 12-month summation. K005 took an operational restriction to limit the coating of Chemlok 205 to 1600 gallons and Chemlok 252X to 2000 gallons applied on an annual basis based upon a rolling, 12-month summation. L001 has an operational restriction of 1500 gallons of solvent usage on an annual basis based upon a rolling, 12-month summation.

5. Conclusion:

   As part of the company's strategy to avoid Title V applicability, this FEPTIO will incorporate federally enforceable permit conditions to limit the facility's NOx emissions to 36.21 tons per rolling, 12-month period and limit the facility's HAPs emissions to 9.90 tons per rolling, 12-month period for any individual HAP and 24.90 tons per rolling, 12-month period for any combination of HAPs. Therefore, D.S. Brown Co will become a synthetic minor facility and Title V permitting requirements will not apply.

6. Please provide additional notes or comments as necessary:

   VOC emissions from K003 are not included in the facility's PTE as it is permanently shutdown.

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

Pollutant	Tons Per Year
VOCs	36.21
Individual HAP	9.9
Combined HAPs	24.9

PUBLIC NOTICE
10/30/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

D.S. BROWN CO
300 E CHERRY ST,
NORTH BALTIMORE, OH 45872
Wood County
FACILITY DESC.: Rubber Product Manufacturing for Mechanical Use
PERMIT #: P0111461
PERMIT TYPE: OAC Chapter 3745-31 Modification
PERMIT DESC: Chapter 31 modification to increase coating usage for K004 from 700 gallons to 1000 gallons per rolling, 12-month period, increase K005 coating usage from 2250 gallons to 3600 gallons per rollling, 12-month period and increase solvent usage for L001 from 800 gallons to 1500 gallons per rolling, 12-month period. As a result, this will increase the facility wide VOC emissions but will maintain the current HAPs emissions. The company is still seeking this to be an FEPTIO for purposes of avoiding TV.

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

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
D.S. BROWN CO

Facility ID:	0387000118
Permit Number:	P0111461
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	10/30/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
D.S. BROWN CO

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Authorization

Facility ID:	0387000118
Application Number(s):	A0045809
Permit Number:	P0111461
Permit Description:	Chapter 31 modification to increase coating usage for K004 from 700 gallons to 1000 gallons per rolling, 12-month period, increase K005 coating usage from 2250 gallons to 3600 gallons per rollling, 12-month period and increase solvent usage for L001 from 800 gallons to 1500 gallons per rolling, 12-month period. As a result, this will increase the facility wide VOC emissions but will maintain the current HAPs emissions. The company is still seeking this to be an FEPTIO for purposes of avoiding TV.
Permit Type:	OAC Chapter 3745-31 Modification
Permit Fee:	$600.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	10/30/2012
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date:	To be entered upon final issuance

This document constitutes issuance to:

D.S. BROWN CO
300 E CHERRY ST
NORTH BALTIMORE, OH 45872

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0111461
Permit Description: Chapter 31 modification to increase coating usage for K004 from 700 gallons to 1000 gallons per rolling, 12-month period, increase K005 coating usage from 2250 gallons to 3600 gallons per rollling, 12-month period and increase solvent usage for L001 from 800 gallons to 1500 gallons per rolling, 12-month period. As a result, this will increase the facility wide VOC emissions but will maintain the current HAPs emissions. The company is still seeking this to be an FEPTIO for purposes of avoiding TV.

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

Emissions Unit ID:	**K004**
Company Equipment ID:	Plate coating area
Superseded Permit Number:	P0087865
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K005**
Company Equipment ID:	Shim Dip Coating Line
Superseded Permit Number:	P0087865
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**L001**
Company Equipment ID:	Cold Cleaner Dip Tank
Superseded Permit Number:	P0087865
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.
The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).
The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed

permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.
If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.
You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.
You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.
Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

2. The permittee is advised that this facility is subject to the "Generally Available Control Technology" (GACT) requirements under 40 CFR Part 63 Subpart HHHHHH (National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Metal Surface Coating Operations). The U.S. EPA is responsible for the administration of the requirements of this rule at this time. It should be noted that the enforcement authority of the GACT requirements has not been delegated to the Ohio EPA at the time of this permit processing. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Northwest District Office.

C. Emissions Unit Terms and Conditions

1. K004, Plate coating area

Operations, Property and/or Equipment Description:

Plate Coating Area (Spray Coating Steel Bearing Plates and Steel Shims)

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

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

a. b)(1)f., d)(4), d)(5), d)(6), d)(7) and e)(4).

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	59.5 lbs volatile organic compounds (VOC)/day from coating operations See b)(2)b. and b)(2)c.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)d.
d.	OAC rule 3745-17-11(C)	See c)(2) and c)(3)
e.	OAC rule 3745-21-09(U)(1)	Exempt, pursuant to OAC rule 3745-21-09(U)(2)(e)(iii) (VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons in any one day).
f.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(4) through d)(7) and e)(4)

(2) Additional Terms and Conditions

a. The permittee has requested the following federally enforceable limitations for purposes of avoiding Title V:

i. Combined annual hazardous air pollutants (HAP) emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K004, and K005 shall not exceed 9.9 tons per rolling, 12-month period for any individual HAP or 24.9 tons per rolling, 12-month period for any combination of HAPs.

These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of any individual HAP or any combination of HAPs, upon issuance of this permit.

ii. The VOC emissions shall not exceed 2.97 tons per rolling, 12-month period based on a production restriction [See c)(1)].

b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-21-09(U)(2)(e)(iii).

c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

d. This paragraph applies once U.S. EPA approves the December 1. 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan, (SIP).

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

c) Operational Restrictions

(1) The maximum annual coating usage for this emissions unit shall not exceed 1000 gallons based upon a rolling, 12-month summation of the monthly coating usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Months(s)	Maximum Allowable Coating Usage Rate (gallons)
1	83
1-2	167
1-3	250
1-4	334
1-5	417
1-6	500
1-7	584
1-8	666
1-9	750
1-10	833
1-11	917
1-12	1000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

(2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for coating usage in this emissions unit:

a. the name and identification number of each coating employed;

b. the volume, in gallons, of each coating employed;

c. the total volume, in gallons, of all of the coatings employed;

d. the VOC content of each coating employed, in pounds per gallon;

e. the total VOC emissions from each coating employed; in pounds [d)(1)b. x d)(1)d.];

f. the total VOC emissions from all coatings employed; in pounds per day [summation of d)(1)e.]

Note: The coating information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

(2) The permittee shall maintain monthly records of the following information for this emissions unit:

a. the name and identification number of each coating employed;

b. the coating usage rate, in gallons;

c. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage rate for each calendar month;

d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month coatings usage rate, in gallons;

e. the VOC content of each coating employed, in pounds per gallon;

f. the total VOC emissions from each coating employed, in tons per month [d)(2)b. x d)(2)e. x 1 ton/2000 lbs];

g. the total VOC emissions from all coatings employed, in tons per month [summation of d)(2)f.]; and

h. beginning the first month of operation following the issuance of this permit, the rolling, 12-month summation of VOC emissions, in tons.

Note: The coating information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

(3) The permittee shall collect and record the following information for HAP emissions each month, for emissions units K001, K002, K004 and K005, combined:

a. the company identification of each coating employed;

b. the amount of each individual HAP (lb/gallon) in each coating employed, as applied;

c. the number of gallons of each coating employed;

d. the emission rate for each individual HAP from each coating employed, [d)(3)b. x d)(3)c.] for each individual HAP, in lbs/month;

e. the total emission rate for each individual HAP from all coatings employed [summation of d)(3)d. for each individual HAP], in lbs/month;

f. the total HAP emission rate for all HAPs combined from all coatings employed [summation of d)(3)e. for all HAPs], in lbs/month; and

g. the annual emissions of each individual HAP and all HAPs combined, based upon a rolling, 12-month summation of emissions.

Note: The coating information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

(4) The FEPTIO application for these emissions unit(s), K004 and K005, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "**X**" hours per day and "**Y**" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: Xylene
TLV (mg/m3): 434,000
Maximum Hourly Emission Rate (lbs/hr): 20.5*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,812
MAGLC (ug/m3): 10,333

Toxic Contaminant: Methyl Isobutyl Ketone
TLV (mg/m3): 205,000
Maximum Hourly Emission Rate (lbs/hr): 13.2*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,168
MAGLC (ug/m3): 4,880

Toxic Contaminant: Ethyl Benzene
TLV (mg/m3): 434,000
Maximum Hourly Emission Rate (lbs/hr): 8.7*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 771.5
MAGLC (ug/m3): 10,333

Toxic Contaminant: Tetrachloroethylene
TLV (mg/m3): 169,000
Maximum Hourly Emission Rate (lbs/hr): 6.93*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 615.8
MAGLC (ug/m3): 4,023

*This emissions unit had previously established requirements under Ohio EPA's "Air Toxics Policy" as specified in PTI #03-13757, issued 8/1/2002. The modeled mass emission rates specified above are from emissions units K004 and K005, combined, and represent the net emission increases associated with this modification.

The permittee, has demonstrated that emissions of xylene, methyl isobutyl ketone, ethyl benzene and tetrachloroethylene, from emissions units K004 and K005, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(5) Prior to making any physical changes to or changes in the method of operation of the emissions units, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

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

(6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

(8) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(9) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the

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

(10) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(11) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

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

(12) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(2) The permittee shall notify the Northwest District Office in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs.

(3) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the rolling, 12-month annual HAP emission limitations of 9.9 tons for any individual HAP or 24.9 tons for any combination of HAPs resulting from the use of coatings and cleanup materials in emissions units K001, K002, K004, and K005, combined;

ii. all exceedances of the rolling, 12-month limitation on coating usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels;

iii. all exceedances of the 59.5 lbs VOC/day from coating operations emission limitation; and

iv. all exceedances of rolling, 12-month VOC limitation of the 2.97 tons..

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

(4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

(5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. <u>Emission Limitations:</u>

Annual HAP emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K004, and K005, combined, shall not exceed 9.9

tons per rolling, 12-month period for any individual HAP or 24.9 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method:

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

b. Emission Limitation:

2.97 tons VOC per rolling, 12-month period

Applicable Compliance Method:

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

c. Emission Limitations:

59.5 lbs VOC/day from coating operations

Applicable Compliance Method:

Compliance with the daily emission limitation shall be based upon the record keeping requirements specified in section d)(1).

d. Emission Limitation:

The maximum daily coatings usage shall not exceed 10 gallons per day

Applicable Compliance Method:

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

(2) Formulation data or USEPA Method 24 shall be used to determine the VOC content of all coating materials.

g) Miscellaneous Requirements

(1) None.

2. K005, Shim Dip Coating Line

Operations, Property and/or Equipment Description:

Metal Parts Adhesives Coating Line (2 dip tanks in series - conveyorized)

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

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

a. b)(1)d., d)(4), d)(5), d)(6), d)(7) and e)(4).

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	See b)(2)a. 59.5 lbs volatile organic compound (VOC)/day from coating operations
b.	ORC 3704.03(T)	See b)(2)b.
c.	OAC rule 3745-21-09(U)(1)	Exempt, pursuant to OAC rule 3745-21-09(U)(2)(e)(iii) (VOC emission exemption, based on maximum daily coating usage never exceeding 10 gallons in any one day).
d.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(4) through d)(7) and e)(4)

(2) Additional Terms and Conditions

a. The permittee has requested the following federally enforceable limitations for purposes of avoiding Title V:

i. Combined annual hazardous air pollutants (HAP) emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K004, and K005 shall not exceed 9.9 tons per rolling, 12-month period for any individual HAP or 24.9 tons per rolling, 12-month period for any combination of HAPs.

These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of any individual HAP or any combination of HAPs, upon issuance of this permit.

ii. The VOC emissions shall not exceed 59.5 lbs/day from coating operations.

iii. The VOC emissions shall not exceed 10.71 tons per rolling, 12-month period based on a production restriction [See c)(1)].

b. In accordance with ORC 3704.03(T), this air contaminant source has the potential to emit of ten or more tons per year of volatile organic compounds (VOC) and as such shall meet the requirements of any applicable RACT rule in effect as of January 1, 2006. This emissions unit involves the surface coating of miscellaneous metal parts and products (defined in OAC rule 3745-21-01) and therefore shall meet the requirements of OAC rule 3745-21-09(U)(2)(e)(iii).

c) Operational Restrictions

(1) The maximum annual coating usage of Chemlok 205 for this emissions unit shall not exceed 1600gallons based upon a rolling, 12-month summation of the coating usage figures. The maximum annual coating usage of Chemlok 252X for this emissions unit shall not exceed 2000 gallons based upon a rolling, 12-month summation of the monthly coating usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Months(s)	Maximum Allowable Coating Usage Rate – Chemlok 205 (gallons)	Maximum Allowable Coating Usage Rate – Chemlok 252X (gallons)
1	137	166
1-2	270	340
1-3	403	506
1-4	536	672
1-5	669	838
1-6	802	1004
1-7	935	1170
1-8	1068	1336
1-9	1201	1502
1-10	1334	1668
1-11	1467	1834

Months(s)	Maximum Allowable Coating Usage Rate – Chemlok 205 (gallons)	Maximum Allowable Coating Usage Rate – Chemlok 252X (gallons)
1-12	1600	2000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for coating usage in this emissions unit:

a. the name and identification number of each coating employed;

b. the volume, in gallons, of each coating employed;

c. the total volume, in gallons, of all of the coatings employed;

d. the VOC content of each coating employed, in pounds per gallon;

e. the total VOC emissions from each coating employed; in pounds [d)(1)b. x d)(1)d.];

f. the total VOC emissions from all coatings employed; in pounds per day [summation of d)(1)e.]

Note: The coating information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

(2) The permittee shall maintain monthly records of the following information for this emissions unit:

a. the name and identification number of each coating employed;

b. the coating usage rate, in gallons;

c. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage rate for each calendar month;

d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month coatings usage rate, in gallons;

e. the VOC content of each coating employed, in pounds per gallon;

f. the total VOC emissions from each coating employed, in tons per month [d)(2)b. x d)(2)e. x 1 ton/2000 lbs];

g. the total VOC emissions from all coatings employed, in tons per month [summation of d)(2)f.]; and

h. beginning the first month of operation following the issuance of this permit, the rolling, 12-month summation of VOC emissions, in tons.

Note: The coating information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

(3) The permittee shall collect and record the following information for HAP emissions each month, for emissions units K001, K002, K004 and K005, combined:

a. the company identification of each coating/make-up solvent employed;

b. the amount of each individual HAP (lb/gallon) in each coating/make-up solvent, as applied;

c. the number of gallons of each coating/make-up solvent employed;

d. the emission rate for each individual HAP from each coating/make-up solvent employed, [d)(3)b. x d)(3)c.] for each individual HAP, in lbs/month;

e. the total emission rate for each individual HAP from all coatings/make-up solvents employed [summation of d)(3)d. for each individual HAP], in lbs/month;

f. the total HAP emission rate for all HAPs combined from all coatings/make-up solvents employed [summation of d)(3)e. for all HAPs], in lbs/month; and

g. the annual emissions of each individual HAP and all HAPs combined, based upon a rolling, 12-month summation of emissions.

Note: The coating information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

(4) The FEPTIO application for these emissions units, K004 and K005, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "**X**" hours per day and "**Y**" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

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

Toxic Contaminant: Xylene
TLV (mg/m3): 434,000
Maximum Hourly Emission Rate (lbs/hr): 20.5*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,812
MAGLC (ug/m3): 10,333

Toxic Contaminant: Methyl Isobutyl Ketone
TLV (mg/m3): 205,000
Maximum Hourly Emission Rate (lbs/hr): 13.2*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,168
MAGLC (ug/m3): 4,880

Toxic Contaminant: Ethyl Benzene
TLV (mg/m3): 434,000
Maximum Hourly Emission Rate (lbs/hr): 8.7*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 771.5
MAGLC (ug/m3): 10,333

Toxic Contaminant: Tetrachloroethylene
TLV (mg/m3): 169,000
Maximum Hourly Emission Rate (lbs/hr): 6.93*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 615.8
MAGLC (ug/m3): 4,023

*This emissions unit had previously established requirements under Ohio EPA's "Air Toxics Policy" as specified in PTI #03-13757, issued 8/1/2002. The modeled mass emission rates specified above are from emissions units K004 and K005, combined, and represent the net emission increases associated with this modification.

The permittee, has demonstrated that emissions of xylene, methyl isobutyl ketone, ethyl benzene and tetrachloroethylene, from emissions units K004 and K005, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(5) Prior to making any physical changes to or changes in the method of operation of the emissions units, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

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

(6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s)

modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(2) The permittee shall notify the Northwest District Office in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs.

(3) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the rolling, 12-month annual HAP emission limitations of 9.9 tons for any individual HAP or 24.9 tons for any combination of HAPs resulting from the use of coatings and cleanup materials in emissions units K001, K002, K004, and K005, combined;

ii. all exceedances of the rolling, 12-month limitation on coating usage; and for the first 12 calendar months of operation or the first 12 calendar

months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels;

iii. all exceedances of the 59.5 lbs VOC/day from coating operations emission limitation; and

iv. all exceedances of the rolling, 12-month VOC limitation of the 10.71 tons..

v. .

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

(4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

(5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. <u>Emission Limitations:</u>

Annual HAP emissions resulting from the use of coatings and cleanup materials in emissions units K001, K002, K004, and K005, combined, shall not exceed 9.9 tons per rolling, 12-month period for any individual HAP or 24.9 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method:

Compliance with the emission limitations above shall be based upon the record keeping requirements in section d)(3).

b. Emission Limitation:

10.71 tons VOC per rolling, 12-month period

Applicable Compliance Method:

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

c. Emission Limitations:

59.5 lbs VOC/day from coating operations

Applicable Compliance Method:

Compliance with the daily emission limitation shall be based upon the record keeping requirements specified in section d)(1).

d. Emission Limitation:

The maximum daily coatings usage shall not exceed 10 gallons per day

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

3. L001, Cold Cleaner Dip Tank

Operations, Property and/or Equipment Description:

Metal Parts Cold Cleaner - MEK - 115 gallons (conveyorized - single one-at-a-time dip)

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

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

a. None.

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	838.75 lbs of volatile organic compounds (VOC)/month See b)(2)b. and b)(2)c.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)d.
d.	OAC rule 3745-21-09(O)	See c)(2), c)(3), c)(4), c)(5) and d)(1)

(2) Additional Terms and Conditions

a. The permittee has requested the following federally enforceable limitations for purposes of avoiding Title V:

i. The VOC emissions shall not exceed 5.03 tons per rolling, 12-month period based on a production restriction [See c)(1)].

b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-21-09(O).

c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

d. This paragraph applies once U.S. EPA approves the December 1. 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan, (SIP).

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

c) Operational Restrictions

(1) The maximum annual solvent usage for this emissions unit shall not exceed 1500 gallons, based upon a rolling, 12-month summation of the solvent usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the solvent usage levels specified in the following table:

Months(s)	Maximum Allowable Solvent Usage Rate (gallons)
1	125
1-2	250
1-3	375
1-4	500
1-5	625
1-6	750
1-7	875
1-8	1000
1-9	1125
1-10	1250
1-11	1375
1-12	1500

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual solvent usage limitation shall be based upon a rolling, 12-month summation of the solvent usage figures.

(2) The cold cleaner shall be equipped with a cover that shall be designed and constructed so that it can be easily operated with one hand.

(3) The conveyor for the cold cleaner shall be equipped to provide for draining of the cleaned parts. (Note: An internal type drainage device cannot fit into the cleaning system.)

(4) The cold cleaner shall have a freeboard ratio greater than or equal to 0.7. "Freeboard ratio" means the freeboard height divided by the width of the degreaser air/solvent area.

(5) The permittee shall operate and maintain the cold cleaner in accordance with the following practices to minimize solvent evaporation from the unit:

a. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.

b. Store waste solvent in covered containers.

c. Close the cover whenever parts are not being handled in the cleaner.

d. Drain the cleaned parts until dripping ceases.

e. Clean only materials that are neither porous nor absorbent.

d) Monitoring and/or Recordkeeping Requirements

(1) Any owner or operator of a solvent metal cleaning operation shall maintain records of the following information in a readily accessible location for at least five years and shall make these records available to the director upon verbal or written request: the types of solvents employed and the vapor pressure of each solvent (pounds per square inch absolute) measured at one hundred degrees Fahrenheit.

(2) The permittee shall collect and record the following information each month regarding VOC emissions from the solvent cleaning operations for this emissions unit:

a. the company identification for each solvent employed;

b. the number of gallons of each solvent employed;

c. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative solvent usage rate for each calendar month;

d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month solvent usage rate, in gallons;

e. the VOC content of each solvent employed, in pounds/gallon;

f. the VOC emissions rate for each solvent employed [d)(2)b. x d)(2)e.] in pounds/month;

g. the total VOC emissions rate for all solvents employed [summation of d)(2)f. x 1 ton/2000 lbs], in tons/month; and

h. beginning the first month of operation following the issuance of this permit, the rolling, 12-month summation of VOC emissions, in tons.

Note: The permittee may calculate the monthly VOC emission rate in accordance with the following formula if waste solvent is sent off-site for reclamation/disposal:

Emission rate + (the total gallons of solvent used x the density) – (the total gallons of waste solvent shipped offsite x the average solvent content of the waste solvent).

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

i. all exceedances of the rolling, 12-month limitation on solvent usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative solvent usage levels; and

ii. all exceedances of the 5.03 tons VOC per rolling, 12-month period emission limitation.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

(3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitation:

5.03 tons VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance with the monthly and annual emission limitations shall be based upon the record keeping requirements in section d)(2).

b. Emission Limitation:

838.75 lbs of VOC/month

Applicable Compliance Method:

Compliance with the monthly emission limitation shall be based upon the record keeping requirements in section d)(2).

g) Miscellaneous Requirements

(1) None.