



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

11/29/2012

CARL ROTH
MCI SERVICE PARTS
520 N SPRING ST
LOUDONVILLE, OH 44842

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0303000098
Permit Number: P0112007
Permit Type: Renewal
County: Ashland

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

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

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NWDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
MCI SERVICE PARTS**

Facility ID:	0303000098
Permit Number:	P0112007
Permit Type:	Renewal
Issued:	11/29/2012
Effective:	11/29/2012
Expiration:	11/29/2017



Division of Air Pollution Control
Permit-to-Install and Operate
for
MCI SERVICE PARTS

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit?	4
3. What records must I keep under this permit?	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application?	5
6. What happens to this permit if my project is delayed or I do not install or modify my source?	5
7. What reports must I submit under this permit?	5
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?	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?	7
15. What happens if a portion of this permit is determined to be invalid?	7



Final Permit-to-Install and Operate
MCI SERVICE PARTS
Permit Number: P0112007
Facility ID: 0303000098
Effective Date: 11/29/2012

Authorization

Facility ID: 0303000098
Application Number(s): A0045729
Permit Number: P0112007
Permit Description: Synthetic Minor FEPTIO Permit renewal containing federally-enforceable restrictions for coating lines, spray booths and a brake shoe cold cleaning station. (K001-K003, R001, R005, L002). This renewal permit also contains an incinerator (N001).
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 11/29/2012
Effective Date: 11/29/2012
Expiration Date: 11/29/2017
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

MCI SERVICE PARTS
326 N WATER ST
LOUDONVILLE, OH 44842

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

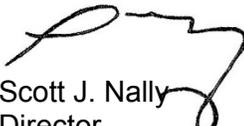
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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: P0112007

Permit Description: Synthetic Minor FEPTIO Permit renewal containing federally-enforceable restrictions for coating lines, spray booths and a brake shoe cold cleaning station. (K001-K003, R001, R005, L002). This renewal permit also contains an incinerator (N001).

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

Emissions Unit ID:	K001
Company Equipment ID:	Misc. Parts Conveyor Paint Line
Superseded Permit Number:	03-16199
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Brake Shoe Primer/Dip Station
Superseded Permit Number:	03-16199
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Full Size Bus Paint Booth
Superseded Permit Number:	03-16199
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	L002
Company Equipment ID:	Brake Shoe Cold Cleaning Station
Superseded Permit Number:	03-0783
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	N001
Company Equipment ID:	Brake Shoe Burn Off Oven
Superseded Permit Number:	03-16152
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R001
Company Equipment ID:	Detailed Part Paint Booth
Superseded Permit Number:	03-16199
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R005
Company Equipment ID:	Misc. Detailed Parts Paint Booth
Superseded Permit Number:	03-16199
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
MCI SERVICE PARTS
Permit Number: P0112007
Facility ID: 0303000098
Effective Date: 11/29/2012

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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



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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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



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

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

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

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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).



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.

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.



Final Permit-to-Install and Operate
MCI SERVICE PARTS
Permit Number: P0112007
Facility ID: 0303000098
Effective Date: 11/29/2012

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.
2. The permittee is advised that this facility may be subject to the requirements of 40 CFR Part 63 Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources and/or Subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants for Metal Fabrication and Finishing. Although Ohio EPA has determined that this Generally Available Control Technology (GACT) NESHAP applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.

On January 9, 2008, U.S. EPA promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR Part 63 Subpart HHHHHH. Spray applications using coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or Cadmium (Cd) and paint stripping operations using methylene chloride must be operated in compliance with 40 CFR Part 63, Subpart HHHHHH, the national emission standards for hazardous air pollutants for paint stripping and miscellaneous surface coating operations. U.S. EPA shall be regulating and enforcing the requirements of these standards, not the Ohio EPA. This permit only provides the permittee notice of these additional requirements, if applicable.

On July 23, 2008, U.S. EPA promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Nine Metal Fabrication and Finishing Source Categories at Area Sources, 40 CFR Part 63 Subpart XXXXXX. Metal fabrication or finishing metals containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or Cadmium (Cd) must be operated in compliance with 40 CFR Part 63, Subpart XXXXXX, the national emission standards for hazardous air pollutants for metal fabrication and finishing. U.S. EPA shall be regulating and enforcing the requirements of these standards, not the Ohio EPA. This permit only provides the permittee notice of these additional requirements, if applicable.



Final Permit-to-Install and Operate
MCI SERVICE PARTS
Permit Number: P0112007
Facility ID: 0303000098
Effective Date: 11/29/2012

C. Emissions Unit Terms and Conditions



1. K001, Misc. Parts Conveyor Paint Line

Operations, Property and/or Equipment Description:

Miscellaneous Parts Conveyor Paint Line.

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	95.00 tons VOC per rolling, 12-month period from coating and cleanup operations for emission units K001, K002, K003, L002, R001, and R005, combined. 9.50 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.00 tons per rolling, 12 month period for any combination of HAPs for emission units K001, K002, K003, L002, R001, and R005, combined. See b)(2)a.

- (2) Additional Terms and Conditions



- a. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 95.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K002, K003, L002, R001, and R005 combined (See c)(1)).
 - ii. Annual HAP emissions from emissions units K001, K002, K003, L002, R001, and R005 combined, shall not exceed 9.50 tons per rolling, 12-month period for any individual HAP or 24.00 tons per rolling, 12-month period for any combination of HAPs.
- b. This emissions unit is not subject to OAC rule 3745-21-09 because the facility is not located in any of the counties listed in OAC rule 3745-21-09(A)(a), the construction of this emissions unit commenced prior to March 27, 1981, or this emissions unit is not located at a facility having the potential to emit a total of 100 tons or more of VOC per calendar year.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, L002, R001, and R005 combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i] \div \frac{2000 \text{ lbs}}{\text{ton}} - \left[(P_o \text{VOC}_o) \div \frac{2000 \text{ lbs}}{\text{ton}} \right] \leq 95.0$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating/cleanup material employed

G_i = Gallons used of each coating/cleanup material for the rolling 12 month period

n = total number of unique coating/cleanup materials employed in emission units K001, K002, K003, L002, R001 and R005

P_o = total gallons of recovered solvents

VOC_o = VOC content of recovered solvents in pounds of VOC per gallon

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, L002, R001 and R005, combined:
 - a. the company name or identification for each coating/cleanup material employed;



- b. the volume, in gallons, of each coating/cleanup material employed;
 - c. the VOC content of each coating/cleanup material employed, in pounds per gallon, as applied; and
 - d. the rolling 12-month summation of VOC emissions from the coating/cleanup material employed, prior to any credit claimed for solvent recycling i.e., the sum of the usage of each material employed multiplied by its respective VOC content.
- (2) If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered materials, and the recovery drum or tank serving this emissions unit:
- a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;
 - b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;
 - c. a record of the VOC content of each material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;
 - d. the mass (lbs) of VOC to be credited to the rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped [i.e., d)(2)b. x d)(2)c.], and the date of each such shipment or record of credit;
 - e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits [d)(2)d.], for each shipment recorded during the rolling 12 month period; and
 - f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.
- (3) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, L002, R001, and R005, combined:
- a. the company identification of each coating/cleanup material employed;
 - b. the amount of each individual HAP in each coating/cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating/cleanup material employed;
 - d. the emission rate for each individual HAP from each coating/cleanup material employed [d)(3)b. x d)(3)c.] for each individual HAP, in lbs;



- e. the total emission rate for each individual HAP from all the coatings/cleanup materials employed [for each individual HAP, the summation of d)(3)d. for allcoatings/cleanup materials], in lbs;
- f. the total HAP emission rate for all HAPs combined from all the coatings/cleanup materials employed [summation of d)(3)e. for all HAPs for all coatings/cleanupmaterials], in lbs;and
- g. therolling, 12-month emissions of each individual HAP and all HAPs combined, intons.

e) Reporting Requirements

- (1) 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. the rolling, 12-month VOCemission limitation of 95.00 tons; and
 - ii. the rolling, 12-month individualHAP and combined HAPs emission limitations of 9.50 tons and 24.00 tons,respectively (for emissions units K001, K002, K003, L002, R001, and R005 combined);
 - 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).

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

95.00 tons of VOC per rolling, 12-month period, from coatings/cleanup usage
Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in d)(1) of this permit.

b. Emission Limitation:

9.50 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling 12-month period for any combination of HAPs: for emissions units K001, K002, K003, L002, R001 and R005, combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in d)(3).

(2) Formulation data or US EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the VOC content of materials.

g) Miscellaneous Requirements

(1) None.



2. K002, Brake Shoe Primer/Dip Station

Operations, Property and/or Equipment Description:

Primer Spray and Dip Spray Station.

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	41.0 pounds Volatile Organic Compounds (VOC)/day and 7.5 tons VOC/yr See section b)(2)a.
b.	OAC rule 3745-31-05(D)	95.00 tons VOC per rolling, 12-month period for emission units K001, K002, K003, L002, R001, and R005 combined 9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.0 tons per rolling, 12-month period for any combination of HAPs for emission units K001, K002, K003, L002, R001, and R005 combined See b)(2)b.
c.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)c.



(2) Additional Terms and Conditions

- a. The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-21-09 (U)(2)(e)(iii).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 95.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K002, K003, L002, R001, and R005 combined [See c)(1)]; and
 - ii. Annual HAP emissions from emissions units K001, K002, K003, L002, R001, and R005 combined, shall not exceed 9.50 tons per rolling, 12-month period for any individual HAP or 24.00 tons per rolling, 12-month period for any combination of HAPs.
- c. The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, L002, R001, and R005 combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i] \div \frac{2000 \text{ lbs}}{\text{ton}} - \left[(P_o \text{VOC}_o) \div \frac{2000 \text{ lbs}}{\text{ton}} \right] \leq 95.0$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating/cleanup material employed

G_i = Gallons used of each coating/cleanup material for the rolling 12 month period

n = total number of unique coating/cleanup materials employed in emission units K001, K002, K003, L002, R001 and R005

P_o = total gallons of recovered solvents

VOC_o = VOC content of recovered solvents in pounds of VOC per gallon

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records of the following information for emissions unit K002:



- a. the name and identification number of each coating employed;
 - b. the VOC content of each coating, in pounds per gallon, as applied;
 - c. the number of gallons, of each coating employed;
 - d. the total volume, in gallons, of all coatings employed;
 - e. the total VOC emissions from all coatings employed, in pounds per day, [summation of d)(1)b. x d)(1)c. for all coatings employed]; and
 - f. the annual year to date VOC emissions from all coatings employed, in tons per year, [summation of d)(1)d. for each calendar month to date from January December].
- (2) The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, L002, R001 and R005, combined:
- a. the company name or identification for each coating/cleanup material employed;
 - b. the volume, in gallons, of each coating/cleanup material employed;
 - c. the VOC content of each coating/cleanup material employed, in pounds per gallon, as applied; and
 - d. the rolling 12-month summation of VOC emissions from the coating/cleanup material employed, prior to any credit claimed for solvent recycling i.e., the sum of the usage of each material employed multiplied by its respective VOC content.
- (3) If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered materials, and the recovery drum or tank serving this emissions unit:
- a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;
 - b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;
 - c. a record of the VOC content of each material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;
 - d. the mass (lbs) of VOC to be credited to the rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped [i.e., d)(3)b. x d)(3)c.], and the date of each such shipment or record of credit;



- e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits [d)(3)d.], for each shipment recorded during the rolling 12 month period; and
 - f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.
- (4) The permittee shall collect and record the following HAP information each month foremissions units K001, K002, K003, L002, R001, and R005 combined:
- a. the company identification of each coating/cleanup material employed;
 - b. the amount of each individual HAP in each coating/cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating/cleanup material employed;
 - d. the emission rate for each individual HAP from each coating/cleanup material employed [d)(4)b. x d)(4)c.] for each individual HAP, in lbs;
 - e. the total emission rate for each individual HAP from all the coatings/cleanup materials employed [for each individual HAP, the summation of d)(4)d. for all coatings/cleanup materials], in lbs;
 - f. the total HAP emission rate for all HAPs combined from all the coatings/cleanup materials employed [summation of d)(4)e. for all HAPs for all coatings/cleanup materials], in lbs; and
 - g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
- e) Reporting Requirements
- (1) 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. the rolling, 12-month VOC emission limitation of 95.00 tons; and
 - ii. the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.50 tons and 24.00 tons, respectively (for emissions units K001, K002, K003, L002, R001, and R005 combined);
 - 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).

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall notify the Northwest District Office in writing of any daily record showing that the coating line employs 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.
- (4) 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:

41.0 lbs VOC/day, 7.5 tons VOC/yr

Applicable Compliance Method

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

- b. Emission Limitation:

VOC emission exemption, based on maximum coating usage never exceeding 10 gallons in any one day

Applicable Compliance Method

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



c. Emission Limitation:

95.00 tons of VOC per rolling, 12-month period, from coatings/cleanup usage

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in d)(2) of this permit.

d. Emission Limitation:

9.50 tons per rolling, 12-month period for any individual HAP and 24.00 tons perrolling 12-month period for any combination of HAPs: for emissions units K001, K002, K003, L002, R001 and R005, combined

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in d)(4).

g) Miscellaneous Requirements

(1) None.



3. K003, Full Size Bus Paint Booth

Operations, Property and/or Equipment Description:

Full Size Paint Booth.

- 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. g)(1).
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	16.2 pounds organic compounds (OC)/hr and 7.3 tons OC/yr See b)(2)a. and b)(2)c.
b.	OAC rule 3745-31-05(D)	95.00 tons VOC per rolling, 12-month period for emission units K001, K002, K003, L002, R001, and R005 combined 9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.0 tons per rolling, 12-month period for any combination of HAPs for emission units K001, K002, K003, L002, R001, and R005 combined See b)(2)b.
c.	OAC rule 3745-21-09(U)(2)(c)	VOC emission exemption based on the



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		repainting (refinishing) of used motor vehicles.

(2) Additional Terms and Conditions

- a. The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-21-09 (U)(2)(c).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 95.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K002, K003, L002, R001, and R005 combined [See c)(1)].
 - ii. Annual HAP emissions from emissions units K001, K002, K003, L002, R001, and R005 combined, shall not exceed 9.50 tons per rolling, 12-month period for any individual HAP or 24.00 tons per rolling, 12-month period for any combination of HAPs.
- c. The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with this emission limitation

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, L002, R001, and R005 combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i] \div \frac{2000 \text{ lbs}}{\text{ton}} - \left[(P_o \text{VOC}_o) \div \frac{2000 \text{ lbs}}{\text{ton}} \right] \leq 95.0$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating/cleanup material employed

G_i = Gallons used of each coating/cleanup material for the rolling 12 month period

n = total number of unique coating/cleanup materials employed in emission units K001, K002, K003, L002, R001 and R005

P_o = total gallons of recovered solvents



VOC_o =VOC content of recovered solvents in pounds of VOC per gallon

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for emissions unit K003:
 - a. the name and identification number of each coating employed;
 - b. the OC content of each coating, in pounds per gallon, as applied;
 - c. the number of gallons, of each coating employed;
 - d. the total OC emissions from all coatings employed, in pounds per month, [summation of d)(1)b. x d)(1)c. for all coatings employed]; and
 - e. the annual year to date OC emissions from all coatings employed, in tons per year, [summation of d)(1)d. for each calendar month to date from January to December].
- (2) The permittee shall maintain monthly records of the following information for emissions
 - a. units K001, K002, K003, L002, R001 and R005, combined:
 - b. the company name or identification for each coating/cleanup material employed;
 - c. the volume, in gallons, of each coating/cleanup material employed;
 - d. the VOC content of each coating/cleanup material employed, in pounds per gallon, as applied; and
 - e. the rolling 12-month summation of VOC emissions from the coating/cleanup material employed, prior to any credit claimed for solvent recycling i.e., the sum of the usage of each material employed multiplied by its respective VOC content.
- (3) If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered materials, and the recovery drum or tank serving this emissions unit:
 - a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;
 - b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;
 - c. a record of the VOC content of each material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;



- d. the mass (lbs) of VOC to be credited to the rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped [i.e., d)(3)b. x d)(3)c.], and the date of each such shipment or record of credit;
 - e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits [d)(3)d.], for each shipment recorded during the rolling 12 month period; and
 - f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.
- (4) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, L002, R001, and R005 combined:
- a. the company identification of each coating/cleanup material employed;
 - b. the amount of each individual HAP in each coating/cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating/cleanup material employed;
 - d. the emission rate for each individual HAP from each coating/cleanup material employed [d)(4)b. x d)(4)c.] for each individual HAP, in lbs;
 - e. the total emission rate for each individual HAP from all the coatings/cleanup materials employed [for each individual HAP, the summation of d)(4)d. for all coatings/cleanup materials], in lbs;
 - f. the total HAP emission rate for all HAPs combined from all the coatings/cleanup materials employed [summation of d)(4)e. for all HAPs for all coatings/cleanup materials], in lbs; and
 - g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
- e) Reporting Requirements
- (1) 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. the rolling, 12-month VOC emission limitation of 95.00 tons; and



- ii. the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.50 tons and 24.00 tons, respectively (for emissions units K001, K002, K003, L002, R001, and R005 combined);
- 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).

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

16.2 lbs OC/hr and 7.3 tons OC/yr

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (2.0 gallons per hour) by the maximum OC content of all the coatings (8.1 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.



Compliance with the annual allowable OC emission limitation shall be based on the record keeping requirements as specified in d)(1).

b. Emission Limitation:

95.00 tons of VOC per rolling, 12-month period, from coatings/cleanup usage

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in d)(2) of this permit.

c. Emission Limitation:

9.50 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling 12-month period for any combination of HAPs: for emissions units K001, K002, K003, L002, R001 and R005, combined

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in d)(4).

- (2) Formulation data or US EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the VOC content of materials.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use new materials that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.



4. L002, Brake Shoe Cold Cleaning Station

Operations, Property and/or Equipment Description:

Brake Shoe Cold Cleaning Station

- 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. d)(5) – d)(7).
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	50.4 pounds volatile organic compounds (VOC)/day and 9.2 tons VOC/yr See b)(2)a.
b.	OAC rule 3745-31-05(D)	95.00 tons VOC per rolling, 12-month period from coating and cleanup operations for emission units K001, K002, K003, L002, R001, and R005 combined 9.50 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.00 tons per rolling, 12-month period for any combination of HAPs for emission units K001, K002, K003, L002, R001, and R005 combined See b)(2)b.
c.	OAC rule 3745-21-09(O)(2)	See b)(2)c.



- (2) Additional Terms and Conditions
- a. The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-21-09 (O)(2).
 - b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 95.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K002, K003, L002, R001, and R005 combined (See c)(1)).
 - ii. Annual HAP emissions from emissions units K001, K002, K003, L002, R001, and R005 combined, shall not exceed 9.50 tons per rolling, 12-month period for any individual HAP or 24.00 tons per rolling, 12-month period for any combination of HAPs.
 - c. In accordance with OAC rule 3745-21-09(O)(2), each owner or operator of a cold cleaner shall
 - i. equip the cold cleaner with either:
 - (a) a cover- if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute measured at 100 degrees Fahrenheit or the solvent is heated or agitated, the cover shall be signed and constructed so that it can be easily operated with one hand; or
 - (b) a remote solvent reservoir from which solvent is pumped through nozzle suspended over a sink-like work area which drains back to the reservoir, provided a sink-like work area has an open drain area of less than 16 square inches and provided the solvent is neither heated above 120 degrees Fahrenheit nor has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit;
 - ii. equip the cold cleaner with a device for draining the cleaned parts-if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system;
 - iii. install one of the following devices if the solvent vapor pressure is greater than 0.6 pound per square inch absolute measured at 100 degrees Fahrenheit, or if the solvent is heated above 120 degrees Fahrenheit;
 - (a) freeboard that gives a freeboard ratio greater than or equal to 0.7;
 - (b) water cover (solvent must be insoluble in and heavier than water);



or

(c) other systems of equivalent control, such as refrigerated chiller or carbon adsorption, approved by the Director; and

iv. operate and maintain the cold cleaner in a manner which is consistent with good engineering practice and which minimizes solvent evaporation from the unit.

c) Operational Restrictions

(1) The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, L002, R001, and R005 combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i] \div \frac{2000 \text{ lbs}}{\text{ton}} - \left[(P_o \text{VOC}_o) \div \frac{2000 \text{ lbs}}{\text{ton}} \right] \leq 95.0$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating/cleanup material employed

G_i = Gallons used of each coating/cleanup material for the rolling 12 month period

n = total number of unique coating/cleanup materials employed in emission units K001, K002, K003, L002, R001 and R005

P_o = total gallons of recovered solvents

VOC_o = VOC content of recovered solvents in pounds of VOC per gallon

(2) Emissions unit L002 shall be operated and maintained 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. if used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge; and,

f. clean only materials that are neither porous nor absorbent.



- (3) Emissions unit L002 shall be equipped with a device for draining the cleaned parts; and the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records of the following information for emissions unit L002:
 - a. the types of solvents employed in the cold cleaner;
 - b. the vapor pressure of each solvent, in pound per square inch absolute, measured at 100 degrees Fahrenheit;
 - c. the number of gallons, excluding water and exempt solvents, of each cleaning solvent used;
 - d. the volatile organic compound emission rate for each solvent in pounds/day; and,
 - e. the annual year to date VOC emissions from all solvents material usage (the summation of d)(1)d.)
- (2) The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, L002, R001 and R005, combined:
 - a. the company name or identification for each coating/cleanup material employed;
 - b. the volume, in gallons, of each coating/cleanup material employed;
 - c. the VOC content of each coating/cleanup material employed, in pounds per gallon, as applied;
 - d. the rolling 12-month summation of VOC emissions from the coating/cleanup material employed, prior to any credit claimed for solvent recycling i.e., the sum of the usage of each material employed multiplied by its respective VOC content.
- (3) If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered materials, and the recovery drum or tank serving this emissions unit:
 - a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;
 - b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;
 - c. a record of the VOC content of each material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;



- d. the mass (lbs) of VOC to be credited to the rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped [i.e., d)(3)b. x d)(3)c.], and the date of each such shipment or record of credit;
 - e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits [d)(3)d.], for each shipment recorded during the rolling 12 month period; and
 - f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.
- (4) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, L002, R001, and R005 combined:
- a. the company identification of each coating/cleanup material employed;
 - b. the amount of each individual HAP in each coating/cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating/cleanup material employed;
 - d. the emission rate for each individual HAP from each coating/cleanup material employed [d)(4)b. x d)(4)c.] for each individual HAP, in lbs;
 - e. the total emission rate for each individual HAP from all the coatings/cleanup materials employed [for each individual HAP, the summation of d)(3)d. for all coatings/cleanup materials], in lbs;
 - f. the total HAP emission rate for all HAPs combined from all the coatings/cleanup materials employed [summation of d)(4)e. for all HAPs for all coatings/cleanup materials], in lbs; and
 - g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
- (5) The permit to install for emission unit L002 was evaluated based on the actual materials (coatings, cleanup materials and decreasing materials-specified by the permittee in PTI 03-0783 issued final on December 21, 1998) and the design parameters of the exhaust system for the emission units, 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 2.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum groundlevel concentration from the use of the SCREEN 2.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

TLV (mg/m3): 983,000



Maximum Hourly Emission Rate (lbs/hr): 1.32
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 5,371
MAGLC (ug/m3): 23,404

- (6) Physical changes to or changes in the method of operation of the emission unit(s) after installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emission unit(s) or exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.)
- (7) If the permittee determines that the "Air Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.



e) Reporting Requirements

(1) 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. the rolling, 12-month VOC emission limitation of 95.00 tons; and
 - ii. the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.50 tons and 24.00 tons, respectively (for emissions units K001, K002, K003, L002, R001, and R005 combined);
- 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).

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

50.4 pounds of VOC per day and 9.2 tons of VOC per year



Applicable Compliance Method:

Compliance with the annual allowable VOC emission above shall be based upon the recordkeeping requirements specified in d)(1).

b. Emission Limitation:

95.0 ons of VOC per rolling, 12-month period, from coatings/cleanup usage

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in d)(2).

c. Emission Limitation:

9.50 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling 12-month period for any combination of HAPs: for emissions units K001, K002, K003, L002, R001 and R005, combined

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in d)(4).

- (2) Formulation data or US EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the VOC content of materials.

g) Miscellaneous Requirements

- (1) None.



5. N001, Brake Shoe Burn Off Oven

Operations, Property and/or Equipment Description:

Brake Shoe Burn Off-Oven

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	0.02 lbs of particulate emissions (PE)/hour; 0.09 tons of PE/year 0.02 lb of organic compound (OC)/hr, 0.09 ton of OC/year Opacity Restrictions, see b)(2)a. Control Requirements, see b)(2)b.
b.	OAC rule 3745-17-07(A)	See b)(2)c.
c.	OAC rule 3745-17-09(B)	See b)(2)c.

- (2) Additional Terms and Conditions
 - a. Visible particulate emissions from this emissions unit shall not exceed 5% opacity except for 6 minutes in any continuous 60-minute period during which opacity shall not exceed 10%.



- b. Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the use of natural gas and afterburner. BAT requirements also include compliance with the terms and conditions of this permit.
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

c) Operational Restrictions

- (1) The emissions unit shall be installed, operated and maintained in accordance with the manufacturer's specifications. The permittee shall not change any of the manufacturer's factory preset parameters for the furnace, or physically modify the furnace in any way, without first verifying with the manufacturer that the change(s) would not adversely affect air contaminant emissions from the unit.
- (2) The air contaminant control device for this emissions unit shall be designed and operated in accordance with the following requirements:
 - a. the secondary combustion chamber shall be operated so that the exit gas temperature from the chamber is, at a minimum, 1400 degrees Fahrenheit, taking into account normal start-up procedures.
 - b. the secondary chamber shall allow for a minimum retention time of 0.5 seconds at 1400 degrees Fahrenheit, taking into account normal start-up procedures.
- (3) The permittee shall adhere to the manufacturer's recommendations pertaining to the operation of this furnace and shall comply with the following operational restrictions:
 - a. the permittee shall ensure that the furnace is operated only by properly trained personnel who have read, and understand, the furnace's operation manual;
 - b. prior to start-up of the furnace, the permittee shall remove ash residue left inside the furnace after the previous cycle;
 - c. the permittee shall not operate the furnace if the built-in safeguards and interlocks (furnace excess temperature, afterburner excess temperature, low gas pressure switch, high gas pressure switch, and low water pressure switch) are not operating properly; and
 - d. Emissions unit N001 shall only be used for the purpose of removing non-hazardous material (such as paint, oil, plastic, grease, etc) from reusable metal parts.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall install, operate, and properly maintain a temperature gauge which monitors the temperature of the secondary combustion chamber. The permittee shall record the secondary combustion chamber temperature prior to each batch operation.
- (2) The permittee shall maintain an operation/maintenance log for the emissions unit. The log, at a minimum, shall contain the following information:



- a. the dates the emissions unit was operated
 - b. the number of batches processed for each date the emissions unit was operated; and
 - c. the dates and descriptions of any additional maintenance activities performed on this emissions unit.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
0.02 lbs of PE/hr, 0.09 tons of PE/year

Applicable Compliance Method:

The hourly emission limitation is based on manufacturer stack test data. If required, compliance with the particulate emission limitations shall be determined in accordance with the test method and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.
 - b. Emission Limitation:
0.02 lb OC/hr, 0.09 ton of OC/year

Applicable Compliance Method:

The hourly emission limitation is based on manufacturer stack test data. If required, compliance with the particulate emission limitations shall be determined in accordance with the test method and procedures in Methods 1- 4, 18, 25, or 25A of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours/year and dividing by 2000



lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

c. Emission Limitation:

Visible particulate emissions from this emissions unit shall not exceed 5% opacity except for 6 minutes in any continuous 60-minute period during which opacity shall not exceed 10%.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with the test method and procedures in Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.



6. R001, Detailed Part Paint Booth

Operations, Property and/or Equipment Description:

Detail Parts Paint Booth with Waterwash (L2-DPB).

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	95.00 tons VOC per rolling, 12-month period from coating and cleanup operations for emission units K001, K002, K003, L002, R001, and R005 combined 9.50 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.00 tons per rolling, 12-month period for any combination of HAPs for emission units K001, K002, K003, L002, R001, and R005 combined See b)(2)a.

- (2) Additional Terms and Conditions
 - a. This permit establishes the following federally enforceable emission limitations



for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

- i. 95.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K002, K003, L002, R001, and R005 combined (See c)(1)).
 - ii. Annual HAP emissions from emissions units K001, K002, K003, L002, R001, and R005 combined, shall not exceed 9.50 tons per rolling, 12-month period for any individual HAP or 24.00 tons per rolling, 12-month period for any combination of HAPs.
- b. This emissions unit is not subject to OAC rule 3745-21-09 because the facility is not located in any of the counties listed in OAC rule 3745-21-09(A)(a), the construction of this emissions unit commenced prior to March 27, 1981, or this emissions unit is not located at a facility having the potential to emit a total of 100 tons or more of VOC per calendar year.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, L002, R001, and R005 combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i] \div \frac{2000 \text{ lbs}}{\text{ton}} - \left[(P_o \text{VOC}_o) \div \frac{2000 \text{ lbs}}{\text{ton}} \right] \leq 95.0$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating/cleanup material employed

G_i = Gallons used of each coating/cleanup material for the rolling 12 month period

n = total number of unique coating/cleanup materials employed in emission units K001, K002, K003, L002, R001 and R005

P_o = total gallons of recovered solvents

VOC_o = VOC content of recovered solvents in pounds of VOC per gallon

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, L002, R001 and R005, combined:
- a. the company name or identification for each coating/cleanup material employed;



- b. the volume, in gallons, of each coating/cleanup material employed;
 - c. the VOC content of each coating/cleanup material employed, in pounds per gallon, as applied;
 - d. the rolling 12-month summation of VOC emissions from the coating/cleanup material employed, prior to any credit claimed for solvent recycling i.e., the sum of the usage of each material employed multiplied by its respective VOC content.
- (2) If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered materials, and the recovery drum or tank serving this emissions unit:
- a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;
 - b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;
 - c. a record of the VOC content of each material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;
 - d. the mass (lbs) of VOC to be credited to the rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., $b \times c$), and the date of each such shipment or record of credit;
 - e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the rolling 12 month period; and
 - f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.
- (3) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, L002, R001, and R005 combined:
- a. the company identification of each coating/cleanup material employed;
 - b. the amount of each individual HAP in each coating/cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating/cleanup material employed;
 - d. the emission rate for each individual HAP from each coating/cleanup material employed $[d](3)b. \times d)(3)c.]$ for each individual HAP, in lbs;



- e. the total emission rate for each individual HAP from all the coatings/cleanup materials employed [for each individual HAP, the summation of d)(3)d. for all coatings/cleanup materials], in lbs;
- f. the total HAP emission rate for all HAPs combined from all the coatings/cleanup materials employed [summation of d)(3)e. for all HAPs for all coatings/cleanup materials], in lbs; and
- g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

e) Reporting Requirements

(1) 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. the rolling, 12-month VOC emission limitation of 95.00 tons; and
 - ii. the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.50 tons and 24.00 tons, respectively (for emissions units K001, K002, K003, L002, R001, and R005 combined);
- 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).

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

95.0 tons of VOC per rolling, 12-month period, from coatings/cleanup usage

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in d)(1).

b. Emission Limitation:

9.50 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling 12-month period for any combination of HAPs: for emissions units K001, K002, K003, L002, R001 and R005, combined

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in d)(3).

(2) Formulation data or US EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the VOC content of materials.

g) Miscellaneous Requirements

(1) None.



7. R005, Misc. Detailed Parts Paint Booth

Operations, Property and/or Equipment Description:

Miscellaneous Detailed Parts Paint Spray Booth.

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	95.00 tons VOC per rolling, 12-month period from coating and cleanup operations for emission units K001, K002, K003, L002, R001, and R005 combined. 9.50 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.00 tons per rolling, 12-month period for any combination of HAPs for emission units K001, K002, K003, L002, R001, and R005 combined See b)(2)a.

- (2) Additional Terms and Conditions



- a. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 95.00 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K002, K003, L002, R001, and R005 combined (See c)(1)).
 - ii. Annual HAP emissions from emissions units K001, K002, K003, L002, R001, and R005 combined, shall not exceed 9.50 tons per rolling, 12-month period for any individual HAP or 24.00 tons per rolling, 12-month period for any combination of HAPs.
- b. This emissions unit is not subject to OAC rule 3745-21-09 because the facility is not located in any of the counties listed in OAC rule 3745-21-09(A)(a), the construction of this emissions unit commenced prior to March 27, 1981, or this emissions unit is not located at a facility having the potential to emit a total of 100 tons or more of VOC per calendar year.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coating and cleanup materials employed in emissions units K001, K002, K003, L002, R001, and R005 combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i] \div \frac{2000 \text{ lbs}}{\text{ton}} - \left[(P_o \text{VOC}_o) \div \frac{2000 \text{ lbs}}{\text{ton}} \right] \leq 95.0$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating/cleanup material employed

G_i = Gallons used of each coating/cleanup material for the rolling 12 month period

n = total number of unique coating/cleanup materials employed in emission units K001, K002, K003, L002, R001 and R005

P_o = total gallons of recovered solvents

VOC_o = VOC content of recovered solvents in pounds of VOC per gallon

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, L002, R001 and R005, combined:
 - a. the company name or identification for each coating/cleanup material employed;



- b. the volume, in gallons, of each coating/cleanup material employed;
 - c. the VOC content of each coating/cleanup material employed, in pounds per gallon, as applied; and
 - d. the rolling 12-month summation of VOC emissions from the coating/cleanup material employed, prior to any credit claimed for solvent recycling i.e., the sum of the usage of each material employed multiplied by its respective VOC content.
- (2) If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered materials, and the recovery drum or tank serving this emissions unit:
- a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;
 - b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;
 - c. a record of the VOC content of each material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;
 - d. the mass (lbs) of VOC to be credited to the rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped [i.e., d)(2)b x d)(2)c.], and the date of each such shipment or record of credit;
 - e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits [d)(2)d.], for each shipment recorded during the rolling 12 month period; and
 - f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.
- (3) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, L002, R001, and R005 combined:
- a. the company identification of each coating/cleanup material employed;
 - b. the amount of each individual HAP in each coating/cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating/cleanup material employed;
 - d. the emission rate for each individual HAP from each coating/cleanup material employed [d)(3)b. x d)(3)c.] for each individual HAP, in lbs;



- e. the total emission rate for each individual HAP from all the coatings/cleanup materials employed (for each individual HAP, the summation of d)(3)d. for all coatings/cleanup materials), in lbs;
- f. the total HAP emission rate for all HAPs combined from all the coatings/cleanup materials employed [summation of d)(3)e. for all HAPs for all coatings/cleanup materials], in lbs; and
- g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

e) Reporting Requirements

- (1) 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. the rolling, 12-month VOC emission limitation of 95.00 tons; and
 - ii. the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.50 tons and 24.00 tons, respectively (for emissions units K001, K002, K003, L002, R001, and R005 combined);
 - 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).

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

95.00 tons of VOC per rolling, 12-month period, from coatings/cleanup usage

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in d)(1).

b. Emission Limitation:

9.50 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling 12-month period for any combination of HAPs: for emissions units K001, K002, K003, L002, R001 and R005, combined

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in d)(3).

(2) Formulation data or US EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the VOC content of materials.

g) Miscellaneous Requirements

(1) None.