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

1/16/2013

Certified Mail

PEGGY RUSSELL
RUSSELL PRODUCTS CO., INC. FALHOLT
275 N FORGE ST
AKRON, OH 44304

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1677010983
Permit Number: P0112550
Permit Type: Renewal
County: Summit

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 Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

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

Cc: ARAQMD

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
RUSSELL PRODUCTS CO., INC. FALHOLT

Facility ID:	1677010983
Permit Number:	P0112550
Permit Type:	Renewal
Issued:	1/16/2013
Effective:	1/16/2013
Expiration:	1/16/2023

Division of Air Pollution Control
Permit-to-Install and Operate
for
RUSSELL PRODUCTS CO., INC. FALHOLT

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Authorization

Facility ID:	1677010983
Application Number(s):	A0046078
Permit Number:	P0112550
Permit Description:	Renewal PTIO for a miscellaneous metal parts coating line.
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	1/16/2013
Effective Date:	1/16/2013
Expiration Date:	1/16/2023

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

RUSSELL PRODUCTS CO., INC. FALHOLT
1066 HOME AVENUE
AKRON, OH 44310

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:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

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: P0112550
Permit Description: Renewal PTIO for a miscellaneous metal parts coating line.

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

Emissions Unit ID:	**K006**
Company Equipment ID:	Paint Spray Booth - High VOC
Superseded Permit Number:	P0102919
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is takenby 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 Akron Regional Air Quality Management District in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

[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).

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

2. The Ohio EPA has determined 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. Although Ohio EPA has determined that this Generally Available Control Technology (GACT) NESHAP may apply, 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.

C. Emissions Unit Terms and Conditions

1. K006, Paint Spray Booth – High VOC

Operations, Property and/or Equipment Description:

Miscellaneous metal parts coating line employing no more than 3 gallons of coating material per day.

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. c)(2) and d)(4).

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 16-02176)	Volatile organic compound (VOC) emissions shall not exceed 19.0 pounds per day and 3.47 tons per year from coatings and cleanup materials. The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(2) and OAC rule 3745-17-11(A)(1)(i). See b)(2)a.
b.	OAC rule 3745-21-09(U)(2)(e)(ii)	See b)(2)b.
c.	OAC rule 3745-17-11(C)	Exempt per OAC 3745-17-11(A)(1)(i).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR Part 63, Subpart HHHHHH*	Requirements for minimizing emissions from coating and stripping operations, capture efficiency, cleanup, storage and handling of coatings and cleanup materials, and training.

* U.S. EPA's generally available control technology (GACT) and/or management practices for area source categories of HAPs, that have been implemented through the "Integrated Urban Air Toxics Strategy" (64 FR 38715) and promulgated under Section 112(d)(5) of the Clean Air Act, are regulated by the U.S.EPA.

(2) Additional Terms and Conditions

a. The permittee shall apply for and, if required, obtain a modification to this permit or obtain a new final permit-to-install and operate (PTIO) prior to making any change to equipment, change in coatings and/or cleanup materials employed, change in the method of operation, or any other change to any emissions unit that results in an increase in the allowable emissions or results in an increase in emissions of greater than the de minimis levels in OAC rule 3745-15-05 for any type of air contaminant not previously emitted

b. The permittee shall not use more than 3 gallons of coating material per day for the coating of miscellaneous metal parts.

c) Operational Restrictions

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

(2) Prior to the use of any coating in this coating line, the permittee shall determine that the coating meets the toxic screening criteria described below.

Purpose: The purpose of this test is to evaluate coatings to determine if the chemical compounds in the coatings would be emitted at acceptable levels for the general permit.

Data Needed: (1) MSDS sheet for each coating to be evaluated. (2) information on the maximum coating usage rate for the line as discussed in Step 1 below.

Step 1. Using the following factors, calculate the maximum coating usage rate in terms of pounds per hour:

a. Assume the coating line operates at its maximum speed while still making usable product.

b. Assume the coating line is operating at its largest coating laydown rate. This would typically be accomplished by assuming the coating line is painting the largest part available.

c. Using the coating density (pounds/gallon), convert the maximum coating usage rate in gallons per hour to pounds of coating per hour, i.e., multiply the density times the gallons of coating used per hour.

Step 2. Review the material safety data sheet (MSDS) for the coating. Note each chemical compound listed, its TLV and the percent by weight of the chemical compound in the coating.

Step 3. Determine if any of the chemical compounds listed in the MSDS are also listed in the following table. If any of the chemical compounds are listed in the table, then calculate the maximum annual emission of that compound by multiplying the maximum coating usage rate from Step 1.c times the percent by weight of each chemical compound. Then multiply the result by 8760 hours per year. The result will be in pounds of toxic per year.

Check to see if the calculated emission rate is less than the allowable emission rate found in the table below. If all of the compounds emitted have a maximum annual emission rate of less than that allowed in column 4 of the following table, move to step 4. If any of the compounds are emitted at a rate higher than the allowed emission rate in column 4, the appropriate District Office or local air agency must be contacted to determine if the coating can be used.

Chemical Compound	CAS	Molecular Weight (MW)	Allowed Emission Rate (pounds/year)
arsenic compounds, as As	7440-38-2	74.92	1.70
benzene	71-43-2	78.11	1100
benzidine	92-87-5	184.23	5.60
benzo(a)pyrene	50-32-8	252.30	6.90
beryllium (and Be compounds)	7440-41-7	9.01	0.350
Cadmium	7440-43-9	112.4	5.20
Chromium	7440-47-3	varies	0.690
Hexachlorobenzine (HCB)	118-74-1	289.78	35.0
mercury (and Hg compunds)	7439-97-6	200.59	0.1
nickel (Ni subsulfide)	12035-72-2	240.19	17.0
Poloychlorinateddibenzo-p-dioxins	1746-01-6	varies	0.030
Poloychlorinateddibenzofurans	132-64-9	varies	0.030
polychlorinated biphenyls (PCBs, arcolors)	1336-36-3	varies	87.0
vinyl chloride	75-01-4	62.50	2000

Step 4. Find all of the chemical compounds in the coating that have a listed American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Value (TLV). For each chemical compound with a listed TLV (other than those in the above table), calculate the maximum short-term emission rate (pounds/hour) by multiplying the maximum coating usage rate (gallons/hour) times the percent by weight of each chemical compound and the density of the coating (pounds/gallon). The result should be in terms of pounds of the chemical compound per hour.

Step 5. Determine if the compound will be emitted at or below the acceptable rate. This is done by searching the following table for the chemical compound's TLV and then determining the maximum allowed emission rate listed in the below table. (Note: If the TLV is listed as ppm, then convert the TLV to $\mu g/m^3$ by using the following formula: (TLV in ppm) x (MW) x (1000)/24.45 = TLV in $\mu g/m^3$; where MW is the molecular weight of the compound.) This table lists the allowable emission rates for compounds with a TLV between the high range and low range. Compare the maximum calculated short-term emission rate of each chemical compound to the allowed emission rate in the table. If the maximum emission rate is less than the allowed emission rate, then the chemical compound is emitted at an acceptable rate.

TLV Range ($\mu g/m^3$) (The TLV must be less than the high value listed and greater than or equal to the low value listed)		Allowed Emission Rate
Low Value	High Value	Pound(s)/hour
1	15	0.000067
15	30	0.0010
30	60	0.0020
60	120	0.0040
120	240	0.0080
240	480	0.0160
480	960	0.0320
960	1,920	0.0640
1,920	3,840	0.128
3,840	7,680	0.256
7,680	15,360	0.512
15,360	30,720	1.02
30,720	61,440	2.05
61,440	122,880	4.10
122,880	245,760	8.19
245,760	491,520	16.4
491,520	983,040	32.8
983,040	1,966,080	65.5
1,966,080	3,932,160	131

Step 6. Check each chemical compound that has a listed TLV. If all compounds are emitted at a rate less than the allowed emission rate, then the coating passes the toxic screening test and can be used under this permit. If one or more of the chemical compounds are emitted at a rate greater than the allowed emission rate, the appropriate District Office or local air agency must be contacted to determine if the coating can be used.

d) Monitoring and/or Recordkeeping Requirements

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

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

b. the VOC content of each coating employed, in pounds per gallon, as applied;

c. the VOC content of each cleanup material employed, in pounds per gallon;

d. the number of gallons of each coating employed;

e. the number of gallons of each cleanup material employed;

f. the total number of gallons of all the coatings employed; and

g. the total VOC emissions from all the coatings and cleanup materials employed, in pounds, i.e., the sum of d)(1)b. times d)(1)d. for each coating employed plus the sum of d)(1)c. times d)(1)e. for each cleanup material employed.

The coating and cleanup material usage records shall be maintained for a minimum of 3 years.

[Note: The coating information must be for the coatings as applied, including any thinning solvents added to the coating]

(2) The permittee shall calculate and record the total annual VOC emissions from coating and cleanup materials, i.e., the sum of the daily VOC emission rates from the coating and cleanup materials for the calendar year in d)(1)g.

(3) The permittee shall collect and record the results of any toxic screening evaluations done per c)(2).

e) Reporting Requirements

(1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 3 gallons per day. The notification shall include a copy of such record and shall be sent to the appropriate District Office or local air agency within 45 days after the exceedance occurs.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The annual PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit. It is recommended that the annual PER be submitted electronically through the Ohio EPA's "e-Business Center: Air Services", although PERs can be submitted via U.S. postal service or can be hand delivered. The annual compliance reports shall include:

a. a statement as to whether the coating operation was in compliance with each of the listed applicable rules and requirements, including the daily coating usage limitation; and whether the records of the coating and cleanup material usage demonstrated that annual emissions, as calculated in d)(2), did not exceed the ton per year VOC limit;

b. identification of any period of time (date and number of hours) when the dry filtration system was not in service or was not operating in accordance with the manufacturer's or permittee's documented instructions during coating operations; and

c. identification of any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the procedure in c)(2), including any additional HAPs or an increased concentration of HAPs from new coatings or cleanup materials and/or an increase in material usage.

f) Testing Requirements

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

a. Emissions Limitation:

Use no more than 3 gallons of coating material per day for the coating of miscellaneous metal parts.

Applicable Compliance Method:

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

b. Emissions Limitation:

VOC emissions shall not exceed 19.0 pounds per day and 3.47 tons per year from coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1) and d)(2).

(2) In accordance with OAC rule 3745-21-10, U.S. EPA Method 24 shall be used to determine the VOC content of coatings and cleanup materials, where formulation data is not based on the same method or if it is determined to be necessary by the Director.

(3) In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use U.S. EPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

g) Miscellaneous Requirements

(1) None.