



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 03-17364

Fac ID: 0363000039

DATE: 6/5/2008

Steve Reiff, Incorporated
Doug Reiff
5650 N. 800 S.
South Whitley, IN 46787

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

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

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

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

Sincerely,

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

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 6/5/2008
Effective Date: 6/5/2008**

FINAL PERMIT TO INSTALL 03-17364

Application Number: 03-17364
Facility ID: 0363000039
Permit Fee: **\$800**
Name of Facility: Steve Reiff, Incorporated
Person to Contact: Doug Reiff
Address: 5650 N. 800 S.
South Whitley, IN 46787

Location of proposed air contaminant source(s) [emissions unit(s)]:
**5196 U.S. Route 24 East
Antwerp, Ohio**

Description of proposed emissions unit(s):
(2) Spray booths.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	35.48
individual HAP	9.15
combined HAP	22.23
PE	0.98

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

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

Operations, Property, and/or Equipment - (K007) - miscellaneous metal parts coating operation (Paint Booth no. 7) with dry filtration

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)(b)	See A.2.a
OAC rule 3745-31-05(C)	<p>27.72 tons of OC per rolling, 12-month period from coating operations [for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined] (See A.2.b.i and B.1).</p> <p>1,293.75 lbs OC/month, 7.76 tons OC/yr, from cleanup operations [for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined]</p> <p>9.15 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 22.23 tons per rolling, 12-month period for any combination of HAPs [for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined] (See A.2.b.ii).</p>
OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents
OAC rule 3745-17-11(B)	See B.2 and C.9
OAC rule 3745-17-07(A)	See A.2.c
ORC 3704.03(F) and OAC rule 3745-114-01	See A.2.d

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC and PE emissions from this air

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contaminant source since the uncontrolled potential to emit for VOC and PE are less than 10 tons per year.

- 2.b** This permit establishes the following federally enforceable emissions limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. 27.72 tons OC per rolling, 12-month period based on coating usage restrictions for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined (See B.1). For purposes of federal enforceability a limitation on OC effectively restricts VOC.
 - ii. Annual HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.
- 2.c** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to any mass emission limitations in OAC rule 3745-17-11.
- 2.d** In order to demonstrate compliance with the "Toxic Air Contaminant Statute", the Director has established, per ORC 3704.03(F)(4)(c), a limit for 1,6 - hexamethylene diisocyanate, which shall not exceed 0.224 pounds per day. This daily allowable emissions rate was calculated by multiplying the approved daily operating schedule submitted in the permit application (16 hours per day), by the emission rate modeled (0.014 lbs/hour) to determine the ground level concentration.

B. Operational Restrictions

1. The maximum annual coating usage rate for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.
2. Any surface coating process not exempt under paragraphs (A)(1)(h) to (A)(1)(l) of OAC rule 3745-17-11 shall be controlled by a dry particulate filter, water-wash, or equivalent control device or devices.

Emissions Unit ID: K007

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for all the coatings employed in this emissions unit:
 - a. the name and identification number of each coating employed; and
 - b. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$].
2. The permittee shall collect and record the following information each month for all the coatings employed for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined:
 - a. the name and identification number of each coating employed;
 - b. the OC content of each coating, as applied, in pounds per gallon;
 - c. the number of gallons of each coating employed;
 - d. the total number of gallons of all the coatings employed (summation of C.2.c for all coatings);
 - e. the rolling, 12-month coatings usage rates, in gallons;
 - f. the OC emissions rate for each coating employed ($C.2.b \times C.2.c$), in pounds;
 - g. the total OC emissions rate for all the coatings employed (summation of C.2.f for all coatings), in pounds or tons;
 - h. the rolling 12-month OC emissions rate, in tons; and
 - i. the rolling 12-month coatings usage rate, in gallons.
3. The permittee shall collect and record the following each month for cleanup operations in emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined:
 - a. the name and identification number of each cleanup material employed;

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- b. the OC content of each cleanup material employed, in pounds per gallon;
- c. the number of gallons of each cleanup material employed;
- d. the OC emissions from each cleanup material employed (C.3.b x C.3.c);
- e. the total OC emissions from all the cleanup materials employed (summation of C.3.d for each calendar month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off site for disposal or reclamation [minus solids content of said material]) x solvent density.

- 4. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined:
 - a. the company identification of each coating and cleanup material employed;
 - b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the emission rate for each individual HAP from each coating and cleanup material employed (C.4.b x C.4.c) for each individual HAP, in lbs;
 - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of C.4.d for all coatings and cleanup materials), in lbs;
 - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of C.4.e for all HAPs for all coatings and cleanup materials), in lbs; and
 - g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

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5. The permit to install for emissions units K007 and K008 were evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour work week, for each toxic compound emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices";
or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard was then adjusted to account for the duration of the exposure or the operating hours of the emissions units, i.e., "16" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

Emissions Unit ID: K007

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

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

Toxic Contaminant: 1,6 - hexamethylene diisocyanate

TLV (mg/m³): 0.0344

Maximum Hourly Emission Rate (lbs/hr): 0.014 for emissions units K007 and K008 combined

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m³): 1.05

MAGLC (ug/m³): 1.23

The permittee, having demonstrated that emissions of 1,6 - hexamethylene diisocyanate, from emissions units K007 and K008, is estimated to be equal to or greater than eighty percent, but less than 100 percent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

6. Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the changes to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- 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 new toxic air contaminant 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;
 - changes in the composition of the materials, or use of new materials that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

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

7. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute:"
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxics modeled (composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run, that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions units to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.

Emissions Unit ID: **K007**

8. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason for the change and if the change would increase the ground-level concentration.
9. Any surface coating process not exempt under paragraph (A)(1)(h) to (A)(1)(k) of OAC rule 3745-17-11 shall follow all of these work practices:
 - a. The owner or operator shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the owner or operator during the time period in which the control devices are utilized.
 - b. The owner or operator shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator.
 - c. The owner or operator shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the owner or operator shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the owner or operator shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
 - d. The owner or operator shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.
 - e. In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any

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modifications deemed necessary by the owner or operator, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The owner or operator shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.

- f. Any documentation required under paragraphs (C)(2)(d) and (C)(2)(e) of OAC rule 3745-17-11 shall be maintained for not less than five years.
 - g. Any documentation required under paragraphs (C)(2)(a) to (C)(2)(e) of OAC rule 3745-17-11 shall be maintained at the facility and shall be made available to Ohio EPA upon request.
10. The permittee shall collect and record the total hours of operation each day for this emissions unit.

D. Reporting Requirements

- 1. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 3.50 lbs of VOC/gallon of coating, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the rolling, 12-month OC emission limitation of 27.72 tons, for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined).
 - b. All exceedances of the monthly OC emission limitation of 1,293.75 pounds (from the cleanup operations for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined).
 - c. All exceedances of the rolling, 12-month coatings usage restriction of 15,840 gallons (for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined).
 - d. All exceedances of the rolling, 12-month individual HAP and combined HAPs

Emissions Unit ID: **K007**

emission limitations of 9.15 tons and 22.23 tons, respectively (for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from the cleanup operations (for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined). These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall submit quarterly reports to the appropriate Ohio EPA District Office or local air agency, documenting:
 - a. any exceedances of the 16 hours per day requirement in A.2.d; and
 - b. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions units or the exhaust stack have been made, then the report shall include a statement to this effect. These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 27.72 tons of OC per rolling, 12-month period from coating operations [for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined]

Applicable Compliance Method: Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in section C.2 of this permit.
 - b. Emission Limitation: 1,293.75 lbs OC/month, 7.76 tons OC/yr, from the cleanup operations (for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined)

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Applicable Compliance Method: Compliance with the monthly and annual allowable OC emission limitations above shall be based upon the record keeping requirements specified in section C.3 of this permit.

- c. Emission Limitation: Annual HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section C.4 of this permit.

- d. Emission Limitation: 3.50 pounds VOC per gallon of coating, as applied

Applicable Compliance Method: Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section C.1 of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

- e. Emission Limitation: The maximum annual coatings usage rate for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rates.

Applicable Compliance Method: Compliance with the annual allowable coatings usage restriction above shall be based upon the record keeping requirements specified in section C.2 of this permit.

F. Miscellaneous Requirements

None

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

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

Operations, Property, and/or Equipment - (K008) - miscellaneous metal parts coating operation (Paint Booth no. 8) with dry filtration

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)(b)	See A.2.a
OAC rule 3745-31-05(C)	<p>27.72 tons of OC per rolling, 12-month period from coating operations [for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined] (See A.2.b.i and B.1).</p> <p>1,293.75 lbs OC/month, 7.76 tons OC/yr, from cleanup operations [for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined]</p> <p>9.15 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 22.23 tons per rolling, 12-month period for any combination of HAPs [for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined] (See A.2.b.ii).</p>
OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents
OAC rule 3745-17-11(B)	See B.2 and C.9
OAC rule 3745-17-07(A)	See A.2.c
ORC 3704.03(F) and OAC rule 3745-114-01	See A.2.d

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC and PE emissions from this air contaminant source since the uncontrolled potential to emit for VOC and PE are less than 10 tons per year.

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- 2.b** This permit establishes the following federally enforceable emissions limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. 27.72 tons OC per rolling, 12-month period based on coating usage restrictions for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined (See B.1). For purposes of federally enforceability a limitation on OC effectively restricts VOC.
 - ii. Annual HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.
- 2.c** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- 2.d** In order to demonstrate compliance with the "Toxic Air Contaminant Statute", the Director has established, per ORC 3704.03(F)(4)(c), a limit for 1,6 - hexamethylene diisocyanate, which shall not exceed 0.224 pounds per day. This daily allowable emissions rate was calculated by multiplying the approved daily operating schedule submitted in the permit application (16 hours per day), by the emission rate modeled (0.014 lbs/hour) to determine the ground level concentration.

B. Operational Restrictions

1. The maximum annual coating usage rate for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.
2. Any surface coating process not exempt under paragraphs (A)(1)(h) to (A)(1)(l) of OAC rule 3745-17-11 shall be controlled by a dry particulate filter, water-wash, or equivalent control device or devices.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for all the

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coatings employed in this emissions unit:

- a. the name and identification number of each coating employed; and
 - b. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$].
2. The permittee shall collect and record the following information each month for all the coatings employed for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined:
- a. the name and identification number of each coating employed;
 - b. the OC content of each coating, as applied, in pounds per gallon;
 - c. the number of gallons of each coating employed;
 - d. the total number of gallons of all the coatings employed (summation of C.2.c for all coatings);
 - e. the rolling, 12-month coatings usage rates, in gallons;
 - f. the OC emissions rate for each coating employed (C.2.b x C.2.c), in pounds;
 - g. the total OC emissions rate for all the coatings employed (summation of C.2.f for all coatings), in pounds or tons;
 - h. the rolling 12-month OC emissions rate, in tons; and
 - i. the rolling 12-month coatings usage rate, in gallons.
3. The permittee shall collect and record the following each month for cleanup operations in emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined:
- a. the name and identification number of each cleanup material employed;
 - b. the OC content of each cleanup material employed, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;

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- d. the OC emissions from each cleanup material employed (C.3.b x C.3.c);
- e. the total OC emissions from all the cleanup materials employed (summation of C.3.d for each calendar month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off site for disposal or reclamation [minus solids content of said material]) x solvent density.

- 4. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined:
 - a. the company identification of each coating and cleanup material employed;
 - b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the emission rate for each individual HAP from each coating and cleanup material employed (C.4.b x C.4.c) for each individual HAP, in lbs;
 - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of C.4.d for all coatings and cleanup materials), in lbs;
 - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of C.4.e for all HAPs for all coatings and 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 emissions units K007 and K008 were evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters

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of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour work week, for each toxic compound emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard was then adjusted to account for the duration of the exposure or the operating hours of the emissions units, i.e., "16" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: 1,6 - hexamethylene diisocyanate

TLV (mg/m³): 0.0344

Maximum Hourly Emission Rate (lbs/hr): 0.014 for emissions units K007 and K008 combined

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m³): 1.05

MAGLC (ug/m³): 1.23

The permittee, having demonstrated that emissions of 1,6 - hexamethylene diisocyanate, from emissions units K007 and K008, is estimated to be equal to or greater than eighty percent, but less than 100 percent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

6. Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the changes to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determinant the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions units or their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

7. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute:"
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxics modeled (composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run, that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions units to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.
8. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air

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Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason for the change and if the change would increase the ground-level concentration.

9. Any surface coating process not exempt under paragraph (A)(1)(h) to (A)(1)(k) of OAC rule 3745-17-11 shall follow all of these work practices:
 - a. The owner or operator shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the owner or operator during the time period in which the control devices are utilized.
 - b. The owner or operator shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator.
 - c. The owner or operator shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the owner or operator shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the owner or operator shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
 - d. The owner or operator shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.
 - e. In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The owner or operator shall maintain documentation of

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those periods when the control devices are not operating in accordance with such requirements.

- f. Any documentation required under paragraphs (C)(2)(d) and (C)(2)(e) of OAC rule 3745-17-11 shall be maintained for not less than five years.
 - g. Any documentation required under paragraphs (C)(2)(a) to (C)(2)(e) of OAC rule 3745-17-11 shall be maintained at the facility and shall be made available to Ohio EPA upon request.
10. The permittee shall collect and record the total hours of operation each day for this emissions unit.

D. Reporting Requirements

- 1. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 3.50 lbs of VOC/gallon of coating, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the rolling, 12-month OC emission limitation of 27.72 tons, for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined).
 - b. All exceedances of the monthly OC emission limitation of 1,293.75 pounds (from the cleanup operations for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined).
 - c. All exceedances of the rolling, 12-month coatings usage restriction of 15,840 gallons (for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined).
 - d. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.15 tons and 22.23 tons, respectively (for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined).

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These reports shall be submitted in accordance with the general terms and conditions of this permit.

3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from the cleanup operations (for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined). These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall submit quarterly reports to the appropriate Ohio EPA District Office or local air agency, documenting:
 - a. any exceedances of the 16 hours per day requirement in A.2.d; and
 - b. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions units or the exhaust stack have been made, then the report shall include a statement to this effect. These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 27.72 tons of OC per rolling, 12-month period from coating operations [for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined]

Applicable Compliance Method: Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in section C.2 of this permit.
 - b. Emission Limitation: 1,293.75 lbs OC/month, 7.76 tons OC/yr, from the cleanup operations (for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined)

Applicable Compliance Method: Compliance with the monthly and annual allowable OC emission limitations above shall be based upon the record keeping requirements specified in section C.3 of this permit.

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- c. Emission Limitation: Annual HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined, shall not exceed 9.15 tons per rolling, 12-month period for any individual HAP or 22.23 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section C.4 of this permit.

- d. Emission Limitation: 3.50 pounds VOC per gallon of coating, as applied

Applicable Compliance Method: Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section C.1 of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

- e. Emission Limitation: The maximum annual coatings usage rate for emissions units K001, K002, K003, K004, K005, K006, K007, and K008, combined, shall not exceed 15,840 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rates.

Applicable Compliance Method: Compliance with the annual allowable coatings usage restriction above shall be based upon the record keeping requirements specified in section C.2 of this permit.

F. Miscellaneous Requirements

None