



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
SENECA 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: 03-17388

Fac ID: 0374010217

DATE: 3/6/2008

Alpha Coatings, Inc.
Ed Cortez
622 South Corporate Drive
Fostoria, OH 44830

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: 3/6/2008
Effective Date: 3/6/2008**

FINAL PERMIT TO INSTALL 03-17388

Application Number: 03-17388
Facility ID: 0374010217
Permit Fee: **\$600**
Name of Facility: Alpha Coatings, Inc.
Person to Contact: Ed Cortez
Address: 622 South Corporate Drive
Fostoria, OH 44830

Location of proposed air contaminant source(s) [emissions unit(s)]:
**622 South Corporate Drive
Fostoria, Ohio**

Description of proposed emissions unit(s):
Installation of two coating booths and a shared IR curing oven.

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

Alpha Coatings, Inc.
PTI Application: 03-17388
Issued: 3/6/2008

Facility ID: 0374010217

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	2.74 (for emissions unit P007)
OC	75.0 tons per rolling, 365-day period
HAPs	9.9 tons per rolling, 365-day period
	24.9 tons per rolling 365-day period

Emissions Unit ID: P007

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

- 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 -(P007) - infrared paint cure oven (Lines 7 and 8)

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>Combined limitations for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008:</p> <p>75.0 tons OC per rolling, 365-day period (see A.2.b)</p> <p>9.9 tons per rolling, 12-month period for any individual HAP* and 24.9 tons per rolling, 12-month period for any combination of HAPs</p> <p>See A.2.c and A.2.d.</p>
OAC rule 3745-21-07 (G)(1)	OC emissions shall not exceed 3 pounds/hour and 15 pounds/day
OAC rule 3745-114-01 ORC 3704.03 (F)	See C.5 through C.8 and D.4.

* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

2. Additional Terms and Conditions

- The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3) do not apply to the organic compound emissions (OC) from this air contaminant source since the calculated annual emission rate for OC is less than ten tons per year taking into account the federally enforceable rule limit that OC emissions shall not exceed 15 pounds per day under OAC rule 3745-21-07(G)(1).

The potential to emit for OC for this emissions unit is 2.74 tons; determined by multiplying the maximum daily OC emission rate of 15 pounds/day by 365

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days/year and a conversion factor of 1 ton/2000 pounds.

- 2.b** For the purpose of federal enforceability, OC emission limitations will effectively restrict VOC emissions.
- 2.c** This permit establishes a federally enforceable limitation of 75.0 tons OC per rolling, 365-day period for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008, combined, for the purposes of avoiding Title V and PSD applicability. This emissions unit is an existing operation and, as such, has existing records of OC emissions in lieu of establishing monthly OC emission restrictions for the first year of operation.
- 2.d** This permit establishes federally enforceable limitations of 9.9 tons of any individual HAP and 24.9 tons of combined HAPs per rolling, 12-month periods for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008, combined, for the purposes of avoiding Title V and MACT applicability. This emissions unit is an existing operation and, as such, has existing records of HAP emissions in lieu of establishing monthly HAP emission restrictions for the first year of operation.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

- 1. For purposes of calculating the OC emission rates for this emissions unit and the associated spray booths (R007 and R008), the permittee shall utilize a value of 90% as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 10% of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit.
- 2. In order to demonstrate compliance with the hourly and daily OC emission limits, the permittee shall collect and record the following information for each day for the oven:
 - a. the total potential daily organic compound emission rate for all coatings employed in the paint booths associated with this emissions unit, multiplied by the maximum percentage of the emissions associated with this emissions unit

Emissions Unit ID: **P007**

(as defined in Section C.1 of this permit), in pounds per day;

- b. the total number of hours this emissions unit was in operation; and
 - c. the average hourly organic compound emission rate (a/b), in pounds per hour.
3. In order to demonstrate compliance with the rolling, 365-day, OC emission limitation, the permittee shall collect and record the following information each day for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008, combined:
- a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the OC contents of each coating, in pounds per gallon;
 - d. the OC emission rates from the paint booths, in pounds per day, [summation of (b x c) for all coatings employed];
 - e. the annual emissions of OC, in tons, based on a rolling, 365-day summation of the daily OC emission rates.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

4. In order to demonstrate compliance with the rolling, 365-day, HAP emission limitations, the permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008, combined:
- a. the company identification of each coating employed;
 - b. the pounds per gallon of each HAP in each coating, as applied;
 - c. the number of gallons of each coating employed;
 - d. the emission rate, in pounds, for each HAP from each coating employed (b x c);
 - e. the total emission rate for each HAP from all coatings employed [summation of (d) for each HAP], in pounds per month;

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- f. the total HAP emission rate for the combination of all HAPs from all coatings employed (summation of e), in pounds per month;
- g. the annual emissions of each HAP and the combination of all HAPs, based on rolling, 12-month summations.

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

- 5. The permit to install for this/these emissions unit(s) [P007, R007, and R008] was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The Ohio EPA's "Toxic Air Contaminant Statute", ORC 3704.03 (F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (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

Emissions Unit ID: P007

convert the 15-minute exposure limit to an equivalent 8-hour TLV.

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

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

$$\text{TLV OVER } 10 \sim \text{TIMES } \left\{ \frac{\text{TLV OVER } X}{4} \right\} \sim \text{TIMES } \left\{ \frac{\text{TLV OVER } Y}{5} \right\} \sim \text{MAGLC}$$

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

Pollutant: Cyclohexane

TLV (mg/m3): 345

Maximum Hourly Emission Rate (lbs/hr): 39.96

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5,359

MAGLC (ug/m3): 8,196

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 2.64

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 355

MAGLC (ug/m3): 4,877

The permittee, has demonstrated that emissions of cyclohexane and methyl isobutyl ketone, from emissions unit(s) P007, R007, and R008 is/are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic contaminant in accordance with ORC 3704.03 (F).

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

a. changes in the composition of the materials used or the use of new materials,

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that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the ORC 3704.03 (F), the statute, has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), 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 toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with ORC 3704.03 (F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with ORC 3704.03 (F), initially and for each change that

Emissions Unit ID: **P007**

requires re-evaluation of the toxic air contaminant emissions; and

- d. the documentation of the initial evaluation of compliance with ORC 3704.03(F) and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
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 ORC 3704.03 (F) through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions exceeded 3.0 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions exceeded 15.0 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the rolling, 365-day OC emission limitation for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008, combined.
3. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the rolling, 12-month HAP emission limitations for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008, combined.
4. The permittee shall submit annual reports to the Ohio EPA, Northwest District Office documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with ORC 3704.03 (F) through the predicted

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1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

E. Testing Requirements

1. Compliance with the allowable emission limitations specified in Section A.1 of the Terms and Conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitations:
3.0 pounds OC/hour and 15.0 pounds OC/day

Applicable Compliance Method:

The permittee shall demonstrate compliance with these emission limitations in accordance with the recordkeeping requirements specified in Section C.2 of this permit.

- b. Emission Limitation: Combined limit for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008:

75.0 tons OC per rolling, 365-day period

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section C.3 of this permit.

- c. Emission Limitations: Combined limits for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008:

9.9 tons individual HAP per rolling, 12-month period
24.9 tons combined HAPs per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section C.4 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

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

Operations, Property, and/or Equipment -(R007) - paint spray booth with dry filtration (Line 7)

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 (A)(3)	25.60 pounds organic compounds (OC)/hour (See A.2.f) See A.2.b.
OAC rule 3745-31-05 (C)	Combined limits for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008: 75.0 tons OC per rolling 365-day period 9.9 tons per rolling, 12-month period for any individual HAP* and 24.9 tons per rolling, 12-month period for any combination of HAPs See A.2.c through A.2.e.
OAC rule 3745-21-07 (G)(2)	See B.1.
OAC rule 3745-17-11 (B)	0.551 pound particulate emissions (PE)/hour
OAC rule 3745-17-07 (A)	20% opacity as a six-minute average, except as provided by rule
OAC rule 3745-114-01 ORC 3704.03 (F)	See C.4 through C.7 and D.4.

* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act

Issued: 3/6/2008**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 particulate emissions (PE) from this air contaminant source since the calculated annual emission rate for PE is less than ten tons per year taking into account the federally enforceable rule limit that PE shall not exceed 0.551 pound per hour under OAC rule 3745-17-11(B).

The potential to emit for PE for this emissions unit is 2.74 tons; determined by multiplying the 0.551 pound per hour limitation, a maximum operating schedule of 8,760 hours and a conversion factor of 1 ton/2000 pounds..

- 2.b** The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05 (C).
- 2.c** For the purpose of federal enforceability, OC emission limitations will effectively restrict volatile organic compound (VOC) emissions.
- 2.d** This permit establishes a federally enforceable limitation of 75.0 tons OC per rolling, 365-day period for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008, as a group, for the purposes of avoiding Title V and PSD applicability. This emissions unit is an existing operation and, as such, has existing records of OC emissions in lieu of establishing monthly OC emission restrictions for the first year of operation.
- 2.e** This permit establishes federally enforceable limitations of 9.9 tons of any individual HAP and 24.9 tons of combined HAPs per rolling, 12-month periods for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008, as a group, for the purposes of avoiding Title V and MACT applicability. This emissions unit is an existing operation and, as such, has existing records of HAP emissions in lieu of establishing monthly HAP emission restrictions for the first year of operation.
- 2.f** The hourly OC emission limitation is based on the emissions unit's potential to emit. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

B. Operational Restrictions

Alpha Coatings, Inc.

DTI Application: 02 17200

Facility ID: 0374010217

Emissions Unit ID: R007

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the condition specified in Section B.1, the permittee shall maintain monthly records of the following information for this emissions unit:

Emissions Unit ID: **R007**

- a. the company identification for each liquid organic material employed; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01.
2. In order to demonstrate compliance with the rolling, OC emission limitation, the permittee shall collect and record the following information each day for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008, combined:
- a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the OC contents of each coating, in pounds per gallon;
 - d. the OC emission rates from the paint booths, in pounds per day, [summation of (b x c) for all coatings employed];
 - e. the annual emissions of OC, in tons, based on a rolling, 365-day summation of the daily OC emission rates.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

3. In order to demonstrate compliance with the rolling, HAP emission limitations, the permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008, combined:
- a. the company identification of each coating employed;
 - b. the pounds per gallon of each HAP in each coating, as applied;
 - c. the number of gallons of each coating employed;
 - d. the emission rate, in pounds, for each HAP from each coating employed (b x c);
 - e. the total emission rate for each HAP from all coatings employed [summation of (d) for each HAP], in pounds per month;

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- f. the total HAP emission rate for the combination of all HAPs from all coatings employed (summation of e), in pounds per month;
- g. the annual emissions of each HAP and the combination of all HAPs, based on rolling, 12-month summations.

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

- 4. The permit to install for this/these emissions unit(s) [P007, R007, and R008] was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The Ohio EPA's "Toxic Air Contaminant Statute", ORC 3704.03 (F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (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.

Emissions Unit ID: R007

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):
- $$\text{TLV OVER 10} \sim \text{TIMES } \left\{ \frac{8 \text{ OVER } X}{5 \text{ OVER } Y} \right\} = \text{MAGLC}$$
- $$4 \sim \left\{ \text{TLV OVER } XY \right\} = \text{MAGLC}$$

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

Pollutant: Cyclohexane

TLV (mg/m3): 345

Maximum Hourly Emission Rate (lbs/hr): 39.96

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5,359

MAGLC (ug/m3): 8,196

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 2.64

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 355

MAGLC (ug/m3): 4,877

The permittee, has demonstrated that emissions of cyclohexane and methyl isobutyl ketone, from emissions unit(s) P007, R007, and R008 is/are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic contaminant in accordance with ORC 3704.03 (F).

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

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that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the ORC 3704.03 (F), the statute, has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), 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.

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

Emissions Unit ID: **R007**

requires re-evaluation of the toxic air contaminant emissions; and

- d. the documentation of the initial evaluation of compliance with ORC 3704.03(F) and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
7. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with ORC 3704.03 (F) through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
8. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA , Northwest District Office) in writing of any record showing the use of a photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA , Northwest District Office) within 30 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the rolling, 365-day OC emission limitation for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008, combined.
3. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the rolling, 12-month HAP emission limitations for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008, combined.
4. The permittee shall submit annual reports to the Ohio EPA , Northwest District Office documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with ORC 3704.03 (F) through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

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5. The permittee shall notify the Director (the Ohio EPA , Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA , Northwest District Office) within 30 days after the event occurs.

E. Testing Requirements

1. Compliance with the allowable emission limitations specified in Section A.1 of the Terms and Conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
25.60 pounds OC/hour

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission unit's potential to emit*. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

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

*The potential to emit for this emissions unit was based on a maximum OC content of 6.4 pounds/gallon and a maximum hourly usage rate of 4 gallons/hour. This emission limitation is based on a worst-case assumption that all OC emissions from the paint booth and its associated oven are emitted from the booth.

- c. Emission Limitation: Combined limit for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008:

75.0 tons OC per rolling, 365-day period

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section C.2. of this

Emissions Unit ID: R007

permit

- d. Emission Limitations: Combined limits for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008:

9.9 tons individual HAP per rolling, 12-month period
24.9 tons combined HAPs per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with these emission limitations in accordance with the recordkeeping requirements specified in Section C.3 of this permit.

- e. Emission Limitation:
0.551 pound PE/hour

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operations:

$E = \text{PE rate (lbs/hr)}$

$E = \text{maximum coating solids usage rate, in pounds per hour } (1-TE) \times (1-CE)$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment (established at > 98%)

If required, the permittee shall demonstrate compliance with the above emission limitation pursuant to OAC rule 3745-17-03 (B)(10).

- f. Emission Limitation:
20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the above emission limitation pursuant to OAC rule 3745-17-03 (B)(1).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of

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the coatings.

F. Miscellaneous Requirements

1. For purposes of clarification, the cleanup operations associated with this emissions unit do not employ liquid organic materials, as defined in OAC rule 3745-21-07(C).

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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 -(R008) - paint spray booth with dry filtration (Line 8)

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 (A)(3)	25.60 pounds organic compounds (OC)/hour See A.2.b.
OAC rule 3745-31-05 (C)	Combined limits for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008: 75.0 tons OC per rolling 365-day period 9.9 tons per rolling, 12-month period for any individual HAP* and 24.9 tons per rolling, 12-month period for any combination of HAPs See A.2.c through A.2.e.
OAC rule 3745-21-07 (G)(2)	See B.1.
OAC rule 3745-17-11 (B)	0.551 pound particulate emissions (PE)/hour
OAC rule 3745-17-07 (A)	20% opacity as a six-minute average, except as provided by rule
OAC rule 3745-114-01 ORC 3704.03 (F)	See C.4 through C.7 and D.4.

* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act

2. Additional Terms and Conditions

- 2.a** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05

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(A)(3) do not apply to the particulate emissions (PE) from this air contaminant source since the calculated annual emission rate for PE is less than ten tons per year taking into account the federally enforceable rule limit that PE shall not exceed 0.551 pound per hour under OAC rule 3745-17-11(B).

The potential to emit for PE for this emissions unit is 2.74 tons; determined by multiplying the 0.551 pound per hour limitation, a maximum operating schedule of 8,760 hours and a conversion factor of 1 ton/2000 pounds..

- 2.b** The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05 (C).
- 2.c** For the purpose of federal enforceability, OC emission limitations will effectively restrict volatile organic compound (VOC) emissions.
- 2.d** This permit establishes a federally enforceable limitation of 75.0 tons OC per rolling, 365-day period for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008, as a group, for the purposes of avoiding Title V and PSD applicability. This emissions unit is an existing operation and, as such, has existing records of OC emissions in lieu of establishing monthly OC emission restrictions for the first year of operation.
- 2.e** This permit establishes federally enforceable limitations of 9.9 tons of any individual HAP and 24.9 tons of combined HAPs per rolling, 12-month periods for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008, as a group, for the purposes of avoiding Title V and MACT applicability. This emissions unit is an existing operation and, as such, has existing records of HAP emissions in lieu of establishing monthly HAP emission restrictions for the first year of operation.
- 2.f** The hourly OC emission limitation is based on the emission unit's potential to emit. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

B. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.

Emissions Unit ID: **R008**

2. The Permittee shall operate the dry filtration system whenever this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the condition specified in Section B.1, the permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01.
2. In order to demonstrate compliance with the rolling, OC emission limitation, the permittee shall collect and record the following information each day for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008, combined:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the OC contents of each coating, in pounds per gallon;
 - d. the OC emission rates from the paint booths, in pounds per day, [summation of (b x c) for all coatings employed];
 - e. the annual emissions of OC, in tons, based on a rolling, 365-day summation of the daily OC emission rates.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

3. In order to demonstrate compliance with the rolling, HAP emission limitations, the permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008, combined:
 - a. the company identification of each coating employed;

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- b. the pounds per gallon of each HAP in each coating, as applied;
- c. the number of gallons of each coating employed;
- d. the emission rate, in pounds, for each HAP from each coating employed (b x c);
- e. the total emission rate for each HAP from all coatings employed [summation of (d) for each HAP], in pounds per month;
- f. the total HAP emission rate for the combination of all HAPs from all coatings employed (summation of e), in pounds per month;
- g. the annual emissions of each HAP and the combination of all HAPs, based on rolling, 12-month summations.

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

- 4. The permit to install for this/these emissions unit(s) [P007, R007, and R008] was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The Ohio EPA's "Toxic Air Contaminant Statute", ORC 3704.03 (F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (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

Emissions Unit ID: R008

Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

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

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

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting

calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):
$$TLV\ OVER\ 10 \sim TIMES\ 4 \sim \{ TLV\ OVER\ XY \} \sim MAGLC$$

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

Pollutant: Cyclohexane
TLV (mg/m3): 345
Maximum Hourly Emission Rate (lbs/hr): 39.96
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5,359
MAGLC (ug/m3): 8,196

Pollutant: Methyl Isobutyl Ketone
TLV (mg/m3): 205
Maximum Hourly Emission Rate (lbs/hr): 2.64
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 355
MAGLC (ug/m3): 4,877

The permittee, has demonstrated that emissions of cyclohexane and methyl isobutyl ketone, from emissions unit(s) P007, R007, and R008 is/are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic contaminant in accordance with ORC 3704.03 (F).

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5. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the ORC 3704.03 (F), the statute, has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), 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.

6. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change

Emissions Unit ID: **R008**

- 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 ORC 3704.03 (F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with 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 ORC 3704.03(F) and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
7. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with ORC 3704.03 (F) through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
 8. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record showing the use of a photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the exceedance occurs.
2. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the rolling, 365-day OC emission limitation for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008, combined.
3. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the rolling, 12-month HAP emission limitations for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008,

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combined.

4. The permittee shall submit annual reports to the Ohio EPA, Northwest District Office documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with ORC 3704.03 (F) through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
5. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.

E. Testing Requirements

1. Compliance with the allowable emission limitations specified in Section A.1 of the Terms and Conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
25.60 pounds OC/hour

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission unit's potential to emit*. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

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

*The potential to emit for this emissions unit was based on a maximum OC content of 6.4 pounds/gallon and a maximum hourly usage rate of 4 gallons/hour. This emission limitation is based on a worst-case assumption that all OC emissions from the paint booth and its associated oven are emitted from the booth.

Emissions Unit ID: **R008**

- c. Emission Limitation: Combined limit for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008:

75.0 tons OC per rolling, 365-day period

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section C.2 of this permit.

- d. Emission Limitations: Combined limits for emissions units P001, P002, P003, P004, P005, P006, P007, R001, R002, R003, R004, R005, R006, R007, and R008:

9.9 tons individual HAP per rolling, 12-month period

24.9 tons combined HAPs per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with these emission limitations in accordance with the recordkeeping requirements specified in Section C.3 of this permit.

- e. Emission Limitation:
0.551 pound PE/hour

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operations:

$E = \text{PE rate (lbs/hr)}$

$E = \text{maximum coating solids usage rate, in pounds per hour } (1-TE) \times (1-CE)$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment (established at > 98%)

If required, the permittee shall demonstrate compliance with the above emission limitation pursuant to OAC rule 3745-17-03 (B)(10).

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- f. Emission Limitation:
20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the above emission limitation pursuant to OAC rule 3745-17-03 (B)(1).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings.

F. Miscellaneous Requirements

1. For purposes of clarification, the cleanup operations associated with this emissions unit do not employ liquid organic materials, as defined in OAC rule 3745-21-07(C).