



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

2/26/2013

Certified Mail

Mr. Bill Sabo
ROBIN INDUSTRIES
6500 Rockside Road Ste. 230
Independence, OH 44131

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0285000406
Permit Number: P0112673
Permit Type: Initial Installation
County: Wayne

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

Dear Permit Holder:

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

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

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-NEDO; Canada



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Robin Industries, Inc. plans to install two new coating operations in Fredericksburg facility, an automate spray coating operation for coating metal and plastic parts (R004) and an automate spray coating operation for metal parts only (R005). There are three existing coating operations in the, R001, R002, and R003. Emissions units R001 and R002 are plastic dip coating operations for coating plastic parts. Emissions unit R003 is spray coating operation for coating both metal and plastic parts.

There are de minimus sources in (will be in) Fredericksburg facility, includes plastic molding presses (total PTE 0.0193 ton VOC per year), mold release units (total PTE 0.0326 ton VOC per year), post cure operation (PTE 0.4213 ton VOC per year), and rubber molding presses (total PTE 0.2151 tons VPC per year).

3. Facility Emissions and Attainment Status:

The facility is located at Fredericksburg, Wayne County, an area designated as "attainment" for all criteria pollutants, such as ozone, sulfur dioxide, PM_{2.5}, carbon monoxide and lead. Robin Industries, Fredericksburg facility is not a "Major Source" for volatile organic compound (VOC) emissions and will not be a "Major Source" for any single hazardous air pollutant (HAP) and combined total HAPs, based upon the facility-wide restrictions of any single HAP emissions and combined total HAPs emissions. The requirements of Title V and MACT, subpart M, National Emission Standards for Surface Coating of Misc. Metal Parts and Products, are not subject to this facility.

4. Source Emissions:

This FEPTIO contains terms and conditions that restrict the facility-wide any single HAP emissions not to exceed 9.90 tons per year, and combined total HAPs not to exceed 24.90 tons per year. Robin Industries, Fredericksburg facility is also required by this permit to track emissions of any single HAP and combined total HAPs, keep records, and submit reports.

5. Conclusion:

The emission limitations contained in this FEPTIO are adequate to provide federally enforceable limitations to ensure that the MACT, subpart M and Title V thresholds will not be exceeded.

6. Please provide additional notes or comments as necessary:

Even though Robin Industries owns both its Holmco Division and Fredericksburg facility, the two plants are not adjacent or contiguous for the purposes of OAC rule 3745-77-01 (W) in accordance with Engineering Guide #58. The two divisions are more than five miles apart and they are not economically



or operationally dependent on or support to each other. Therefore, these two plants are not concerned as the ONE facility for Title V purpose.

The spray coating operation, R004, subject to MACT subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

However, MACT, subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, is not applicable to both metal coating operations, R004 and R005. It is because they are not in the nine source categories.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC _{R004 & R005}	26.58
Any Single HAP _{facility-wide}	9.90
Combined Total HAP _{facility-wide}	24.90

PUBLIC NOTICE
2/26/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

ROBIN INDUSTRIES
300 WEST CLAY ST,
Fredericksburg, OH 44627
Wayne County
FACILITY DESC.: All Other Plastics Product Manufacturing
PERMIT #: P0112673
PERMIT TYPE: Initial Installation
PERMIT DESC: FEPTIO for installation of two coating operations.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the permit # or: Tracy Gu, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
ROBIN INDUSTRIES**

Facility ID:	0285000406
Permit Number:	P0112673
Permit Type:	Initial Installation
Issued:	2/26/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



**Division of Air Pollution Control
Permit-to-Install and Operate
for
ROBIN INDUSTRIES**

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Draft Permit-to-Install and Operate

ROBIN INDUSTRIES

Permit Number: P0112673

Facility ID: 0285000406

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0285000406

Application Number(s): A0046621, A0046696, A0046751

Permit Number: P0112673

Permit Description: FEPTIO for installation of two coating operations.

Permit Type: Initial Installation

Permit Fee: \$400.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 2/26/2013

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

ROBIN INDUSTRIES
300 WEST CLAY ST
Fredericksburg, OH 44627

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

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Draft Permit-to-Install and Operate

ROBIN INDUSTRIES

Permit Number: P0112673

Facility ID: 0285000406

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0112673

Permit Description: FEPTIO for installation of two coating operations.

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

Emissions Unit ID:	R004
Company Equipment ID:	Robotic Sprayer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R005
Company Equipment ID:	R90 Rotomat
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate

ROBIN INDUSTRIES

Permit Number: P0112673

Facility ID: 0285000406

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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



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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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



Draft Permit-to-Install and Operate
ROBIN INDUSTRIES
Permit Number: P0112673
Facility ID: 0285000406
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



Draft Permit-to-Install and Operate
ROBIN INDUSTRIES
Permit Number: P0112673
Facility ID: 0285000406
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. R004, Robotic Sprayer

Operations, Property and/or Equipment Description:

Robotic Sprayer. Automated coating operation for coating plastic and metal parts with adhesive.

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

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

a. b)(1)f, d)(6), d)(7), d)(8), d)(9) and e)(1)

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

a. b)(1)e, b)(2)d, d)(13), e)(3), f)(1)e and f)(1)f

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(C)	See c)(1), c)(2), d)(1), d)(2), d)(3), d)(4) and d)(5).
b.	OAC rule 3745-21-07(M)(2)	See b)(2)a.
c.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)b.
d.	ORC 3704.03(T)	See b)(2)c.
e.	OAC rule 3745-31-05(D)(1)(b)	See b)(2)d.
f.	ORC 3704.03(F)(4)(d)	See d)(6), d)(7), d)(8), d)(9) and e)(1).

(2) Additional Terms and Conditions

a. In accordance with OAC rule 3745-21-07(M)(3)(a), OAC rule 3745-21-07(M)(2) is not applicable because the emissions unit is not equipped with OC emissions control devices.

b. The permittee shall not employ more than 10 gallons of coating per day for the miscellaneous metal parts and products coating operation. The daily usage limitation shall not include coatings applied to parts or products which are not metal.



- c. Volatile organic compound (VOC) emissions from this emissions unit shall not exceed:
 - i. 12.10 tons per year, when coating miscellaneous metal parts and products; and
 - ii. 7.81 tons per year, when coating plastic parts.

- d. The permittee proposed the following facility-wide restrictions to avoid Title V requirements, as well as MACT requirements under 40 CFR Part 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products:
 - i. facility-wide emissions of each individual hazardous air pollutant (HAP) shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of monthly emissions; and
 - ii. facility-wide emissions of total combined HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.

The permittee has existing records to generate the rolling, 12-month summation of facility-wide emissions of each individual HAP and total combined HAPs.

c) Operational Restrictions

- (1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a



copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

- (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (6) The FEPTIO application for these emissions units, R004 and R005, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):



- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):
 - i. Compound: Methyl isobutyl ketone
TLV (mg/m³): 204.82618
Maximum Hourly Emission Rate (lbs/hr): 0.88
Predicted 1-Hour Maximum Ground Level Concentration (µg/m³): 442.46
MAGLC (µg/m³): 4,876.81
 - ii. Compound: Xylene
TLV (mg/m³): 434.19223
Maximum Hourly Emission Rate (lbs/hr): 10.94
Predicted 1-Hour Maximum Ground Level Concentration (µg/m³): 5500.51
MAGLC (µg/m³): 10,337.91
 - iii. Compound: Ethyl Benzene
TLV (mg/m³): 434.19223
Maximum Hourly Emission Rate (lbs/hr): 1.06



Predicted 1-Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$): 532.96

MAGLC ($\mu\text{g}/\text{m}^3$): 10,337.91

The permittee, has demonstrated that emissions of methyl isobutyl ketone, xylene, and ethyl benzene, from emissions units R004 and R005, 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 air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (7) 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 "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (8) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);



- b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (9) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- (10) The permittee shall collect and record the following information each day, when coating miscellaneous metal parts and products, for the coating and cleanup materials applied in this emissions unit:
- a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the total volume, in gallons, of all of the coatings employed;
 - d. the VOC content for each coating applied, in pounds per gallon;
 - e. the total VOC emissions, in pounds, from all coatings applied, i.e., the summation of the products of "b" times "d" for each individual coating applied;
 - f. the name and identification of each cleanup material employed;
 - g. the VOC content of each cleanup material, in pounds per gallon;
 - h. the number of gallons of each cleanup material employed;
 - i. the total VOC emissions, in pounds, from all cleanup materials, i.e., the summation of the products of "g" times "h" for all cleanup materials employed; and
 - j. the total VOC emissions from all coatings and cleanup materials employed, in pounds, the sum of "e" and "i".



- (11) The permittee shall collect and record the following information each month for this emissions unit, when coating plastic parts, for the coating and cleanup materials applied in this emissions unit:
- a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed minus the number of gallons of each coating and cleanup material recovered for disposal;
 - c. the VOC content of each coating and cleanup material, in pounds VOC per gallon; and
 - d. the total VOC emissions from all the coatings and cleanup materials, in pounds per month, i.e., the summation of the products of "b" times "c" for each coating and cleanup material.
- (12) The permittee shall collect and record the following information each month for this emissions unit:
- a. the volume, in gallons, of each coating and cleanup material employed, i.e., the summation of daily/monthly coating and cleanup material usage, recorded in d)(10) and d)(11), for the month;
 - b. each individual HAP content(s) for each coating and cleanup material applied, in pounds per gallon;
 - c. the total emissions of each individual HAP from all coatings and cleanup materials applied, i.e., the summation of the products of "a" times "b" for each individual coating and cleanup material applied;
 - d. the total combined HAPs content for each coating and cleanup material applied, in pounds per gallon; and
 - e. the total emissions of total combined HAPs from all coatings and cleanup materials applied, i.e., the summation of the products of "a" times "d" for each individual coating and cleanup material applied.
- (13) The permittee shall calculate and record the following facility-wide information each month:
- a. the monthly emissions of each individual HAP, in tons per month;
 - b. the rolling, 12-month summation of emissions of each individual HAP, in tons;
 - c. the monthly total combined HAPs emissions, in tons per month; and
 - d. the rolling, 12-month summation of total combined HAPs emissions, in tons.



e) Reporting Requirements

- (1) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (2) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that this emissions unit employs more than 10 gallons maximum daily coating usage limit for coating miscellaneous metal parts and products. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the facility-wide emissions of each individual HAP shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation of monthly emissions; and
 - ii. the facility-wide emissions of total combined HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summations of monthly emissions.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted (postmarked) each year by the 31st of January (covering October to December), the 30th of April (covering January to March), the 31st of July (covering April to June), and the 31st of October (covering July to September), unless an alternative schedule has been established and approved by the director (the Ohio EPA Northeast District Office).



- (4) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for each emissions unit in the annual Fee Emission Report.
 - (5) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

The permittee shall not employ more than 10 gallons of coating per day for coating miscellaneous metal parts and products in this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(10)c.
 - b. Emission Limitation:

VOC emissions from this emissions unit shall not exceed 12.10 tons per year, when coating miscellaneous metal parts and products.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(10)j and shall be the summation for the calendar year, divided by 2000 lbs/ton.
 - c. Emission Limitation:

VOC emissions from this emissions unit shall not exceed 7.81 tons per year, when coating plastic parts.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(11)d and shall be the summation for the calendar year, divided by 2000 lbs/ton.



d. Emission Limitation:

Facility-wide emissions of each individual HAP shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(13)b.

e. Emission Limitation:

Facility-wide emissions of total combined HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(13)d.

- (2) Any determination of VOC content, solids contents, or density of coating material or cleanup material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-04(B)(5), the permittee shall determine the composition of the coatings or cleanup material by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.

g) Miscellaneous Requirements

- (1) None.



2. R005, R90 Rotomat

Operations, Property and/or Equipment Description:

R90 Rotomat. Automated coating operation for coating metal parts with adhesive.

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

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

a. b)(1)f, d)(6), d)(7), d)(8), d)(9) and e)(1)

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

a. b)(1)e, b)(2)e, d)(12), e)(3), f)(1)d and f)(1)e

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(C)	See c)(1), c)(2), d)(1), d)(2), d)(3), d)(4) and d)(5).
b.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)a.
c.	OAC rule 3745-31-05(A)(3) as effective on 11-30-01	Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 36.57 pounds per day and 6.67 tons per year. See b)(2)b.
d.	OAC rule 3745-31-05 (A)(3)(b) as effective on 12-01-06	See b)(2)c.
e.	OAC rule 3745-31-05(D)(1)(b)	See b)(2)d.
f.	ORC 3704.03(F)(4)(d)	See d)(6), d)(7), d)(8), d)(9) and e)(1).



(2) Additional Terms and Conditions

- a. The permittee shall not employ more than 10 gallons of coating per day for the miscellaneous metal parts and products coating operation. The daily usage limitation shall not include coatings applied to parts or products which are not metal.
- b. The permittee has satisfied the Best Available technology (BAT) requirements pursuant to OAC rule 3745-31-05 (A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply: b)(1)c, b)(2)b, d)(10)d, d)(10)e, d)(10)f, d)(10)g, d)(10)h, d)(10)i, d)(10)j, f)(1)b, and f)(1)c.
- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this emissions unit since the uncontrolled potential to emit for VOC is less than 10 tons per year.

- d. The permittee proposed the following facility-wide restrictions to avoid Title V requirements, as well as MACT requirements under 40 CFR Part 63, Subpart M, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products:
 - i. facility-wide emissions of each individual hazardous air pollutant (HAP) shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of monthly emissions; and
 - ii. facility-wide emissions of total combined HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.

The permittee has existing records to generate the rolling, 12-month summation of facility-wide emissions of each individual HAP and total combined HAPs.

c) Operational Restrictions

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



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

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (6) The FEPTIO application for these emissions units, R004 and R005, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was



performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):
 - i. Compound: Methyl isobutyl ketone
TLV (mg/m³): 204.82618
Maximum Hourly Emission Rate (lbs/hr): 0.88
Predicted 1-Hour Maximum Ground Level Concentration (µg/m³): 442.46
MAGLC (µg/m³): 4,876.81



- ii. Compound: Xylene
TLV (mg/m³): 434.19223
Maximum Hourly Emission Rate (lbs/hr): 10.94
Predicted 1-Hour Maximum Ground Level Concentration (µg/m³): 5500.51
MAGLC (µg/m³): 10,337.91
- iii. Compound: Ethyl Benzene
TLV (mg/m³): 434.19223
Maximum Hourly Emission Rate (lbs/hr): 1.06
Predicted 1-Hour Maximum Ground Level Concentration (µg/m³): 532.96
MAGLC (µg/m³): 10,337.91

The permittee, has demonstrated that emissions of methyl isobutyl ketone, xylene, and ethyl benzene, from emissions units R004 and R005, 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 air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (7) 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 "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a



“modification”, the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (8) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (9) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- (10) The permittee shall collect and record the following information each day for the coating and cleanup materials applied in this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the total volume, in gallons, of all of the coatings employed;
 - d. the VOC content for each coating applied, in pounds per gallon;
 - e. the total VOC emissions, in pounds, from all coatings applied, i.e., the summation of the products of “b” times “d” for each individual coating applied;



- f. the name and identification of each cleanup material employed;
 - g. the VOC content of each cleanup material, in pounds per gallon;
 - h. the number of gallons of each cleanup material employed;
 - i. the total VOC emissions, in pounds, from all cleanup materials, i.e., the summation of the products of "g" times "h" for all cleanup materials employed; and
 - j. the total VOC emissions from all coatings and cleanup materials employed, in pounds, the sum of "e" and "i".
- (11) The permittee shall collect and record the following information each month for this emissions unit:
- a. the volume, in gallons, of each coating and cleanup material employed, i.e., the summation of daily coating and cleanup material usage, recorded in d)(10), for the month;
 - b. each individual HAP content(s) for each coating and cleanup material applied, in pounds per gallon;
 - c. the total emissions of each individual HAP from all coatings and cleanup materials applied, i.e., the summation of the products of "a" times "b" for each individual coating and cleanup material applied;
 - d. the total combined HAPs content for each coating and cleanup material applied, in pounds per gallon; and
 - e. the total emissions of total combined HAPs from all coatings and cleanup materials applied, i.e., the summation of the products of "a" times "d" for each individual coating and cleanup material applied.
- (12) The permittee shall calculate and record the following facility-wide information each month:
- a. the monthly emissions of each individual HAP, in tons per month;
 - b. the rolling, 12-month summation of emissions of each individual HAP, in tons;
 - c. the monthly total combined HAPs emissions, in tons per month; and
 - d. the rolling, 12-month summation of total combined HAPs emissions, in tons.
- e) Reporting Requirements
- (1) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the



emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

- (2) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that this emissions unit employs more than 10 gallons maximum daily coating usage limit for coating miscellaneous metal parts and products. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the facility-wide emissions of each individual HAP shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation of monthly emissions; and
 - ii. the facility-wide emissions of total combined HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summations of monthly emissions.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted (postmarked) each year by the 31st of January (covering October to December), the 30th of April (covering January to March), the 31st of July (covering April to June), and the 31st of October (covering July to September), unless an alternative schedule has been established and approved by the director (the Ohio EPA Northeast District Office).

- (4) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for each emissions unit in the annual Fee Emission Report.



- (5) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:
- The permittee shall not employ more than 10 gallons of coating per day for coating miscellaneous metal parts and products in this emissions unit.
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(10)c.
- b. Emission Limitation:
- VOC emissions from this emissions unit shall not exceed 36.57 pounds per day.
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(10)j.
- c. Emission Limitation:
- VOC emissions from this emissions unit shall not exceed 6.67 tons per year.
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(10)j and shall be the summation for the calendar year, divided by 2000 lbs/ton.
- d. Emission Limitation:
- Facility-wide emissions of each individual HAP shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(12)b.



e. Emission Limitation:

Facility-wide emissions of total combined HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(12)d.

- (2) Any determination of VOC content, solids contents, or density of coating material or cleanup material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-04(B)(5), the permittee shall determine the composition of the coatings or cleanup material by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.

g) Miscellaneous Requirements

- (1) None.