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

2/26/2013

Certified Mail

PEGGY RUSSELL
RUSSELL PRODUCTS CO INC-DEVALERA
275 N FORGE ST
AKRON, OH 44304

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1677010998
Permit Number: P0112956
Permit Type: Renewal
County: Summit

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

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

Cc: ARAQMD

FINAL

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

Facility ID:	1677010998
Permit Number:	P0112956
Permit Type:	Renewal
Issued:	2/26/2013
Effective:	2/26/2013
Expiration:	4/8/2021

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

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Authorization

Facility ID:	1677010998
Application Number(s):	A0046772
Permit Number:	P0112956
Permit Description:	Renewal PTIO for three (3) paint spray booths and a stainless steel metallizing process.
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	2/26/2013
Effective Date:	2/26/2013
Expiration Date:	4/8/2021

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

This document constitutes issuance to:

RUSSELL PRODUCTS CO INC-DEVALERA
1200 DEVALERA AVE.
AKRON, OH 44310

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0112956
Permit Description: Renewal PTIO for three (3) paint spray booths and a stainless steel metallizing process.

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

Emissions Unit ID:	**P002**
Company Equipment ID:	Booth #3 B-Line
Superseded Permit Number:	P0102947
General Permit Category and Type:	Not Applicable

Group Name: Three paint spray booths

Emissions Unit ID:	**K002**
Company Equipment ID:	Booth 2 A-Line
Superseded Permit Number:	P0102947
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K007**
Company Equipment ID:	Booth #4 B-Line
Superseded Permit Number:	P0102947
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K008**
Company Equipment ID:	Booth #5 B-Line
Superseded Permit Number:	P0102947
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

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

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

C. Emissions Unit Terms and Conditions

1. P002, Booth #3 B-Line

Operations, Property and/or Equipment Description:

Stainless steel metallizing process, including electric arc spray guns, and cabinet baffle. This process is not a spray-applied coating operation, as defined in 40 CFR Part 63, Subpart HHHHHH.

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 16-02074)	Particulate emissions (PE) shall not exceed 0.5 pound per hour and 2 tons per year. Visible PE from any stack shall not exceed 10% opacity, as a 6-minute average. The permittee shall properly operate, and maintain P002, in accordance with the manufacturer's recommendations, instructions, and operating manuals.
b.	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	The applicable emissions limits from these rules are less stringent than the above emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The 0.5 pound per hour and 2 tons per year PE limits established pursuant to OAC rule 3745-31-05(A)(3) reflect the potential to emit for this emissions unit.Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with these emissions limits.

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

c) Operational Restrictions

(1) All cabinet doors and openings of this emissions unit shall be closed at all times the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from any stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

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

(2) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(1) above:

a. all days during which visible particulate emissions were observed from any stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

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. <u>Emission Limitation</u>:

Visible PE from any stack shall not exceed 10% opacity, as a 6-minute average.

<u>Applicable Compliance Method</u>:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9and the procedures specified in OAC rule 3745-17-03(B)(1).

b. <u>Emission Limitations</u>:

Particulate emissions (PE) shall not exceed 0.5 pound per hour and 2 tons per year.

<u>Applicable Compliance Method</u>:

If required, compliance shall be determined in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be

less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit-to-install and operate (PTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

2. Emissions Unit Group -Three paint spray booths: K002,K007,K008,

EU ID	Operations, Property and/or Equipment Description
K002	Booth #2 (A-Line) - miscellaneous metal parts coating line, including spray booth exhaust filters, HVLP spray guns, and cure oven
K007	Booth #4 (B-Line) - miscellaneous metal parts coating line, including spray booth exhaust filters, HVLP spray guns, and flash-off and cure ovens
K008	Booth #5 (B-Line) - miscellaneous metal parts coating line, including spray booth exhaust filters, HVLP spray guns, and flash-off and cure ovens

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

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

a. None.

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

a.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 16-02074)	Volatile organic compound (VOC) emissions from each emissions unit shall not exceed 0.92 pound per hour and 4.0 tons per year. The requirements established pursuant to this rule also include the requirements of OAC rule 3745-17-11(C) and OAC rule 3745-21-09(U)(1)(c) and compliance with all terms and conditions of this permit.
b.	OAC rule 3745-21-09(U)(1)(c)	The VOC content of the coatings employed shall not exceed a daily volume weighted average of 3.5 pounds per gallon, as applied, excluding water and

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exempt solvents, for extreme performance coatings.
c.	OAC rule 3745-17-07(A)(3)(h)	The visible particulate emission limitations established in paragraph (A)(1) ofthis rule shall not apply to any air contaminant source which is not subject to any mass emissionlimitation inparagraphs (B)(3) and (B)(4) of rule 3745-17-08 of theAdministrative Code, or rule 3745-17-09, 3745-17-10 or 3745-17-11 of theAdministrative Code.
d.	OAC rule 3745-17-11(C)	See b)(2)(c) below for applicable control measures and work practices for surface coating processes. Surface coating processes are not subject to any mass emission limitation in OAC rule 3745-17-11.
e.	40 CFR Part 63, Subpart HHHHHH*	Requirements for minimizing emissions from coating and stripping operations, capture efficiency, cleanup, storage and handling of coatings and cleanup materials, and training.

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

(2) Additional Terms and Conditions

a. The 0.92 pound per hour and 4.0 tons per year VOC emission limits established pursuant to OAC rule 3745-31-05(A)(3) reflect the potential to emit for this emissions unit.Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with these emissions limits.

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

c. OAC rule 3745-17-11(C) requirements for surface coating processes:

i. Any surface coating process not exempt under paragraphs (A)(1)(h) to (A)(1)(l)of this rule shall be controlled by a dry particulate filter, waterwash, or equivalentcontrol device or devices.

ii. Any surface coating process not exempt under paragraphs (A)(1)(h) to (A)(1)(k)of this rule shall follow all of these work practices:

(a) The owner or operator shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the owner or operator during the time period in which the control devices are utilized.

(b) The owner or operator shall operate the control devices in accordance withthe manufacturer's recommendations, instructions, or operating manualswith any modifications deemed necessary by the owner or operator.

(c) The owner or operator shall conduct periodic inspections of the controldevices to determine whether the devices are operating in accordance withthe manufacturer's recommendations, instructions, or operating manualswith any modifications deemed necessary by the owner or operator. Theperiodic inspections of each control device shall be performed at afrequency that is based upon the recommendation of the manufacturer of thecontrol device, and the owner or operator shall maintain a copy of themanufacturer's recommended inspection frequency. In addition to theseperiodic inspections, not less than once each calendar year the owner oroperator shall conduct a comprehensive inspection of the control devicewhile the emissions unit is shut down and perform any needed maintenanceand repair for the control device to ensure that it is able to routinely operatein accordance with the manufacturer's recommendations.

(d) The owner or operator shall document each inspection of a control device bymaintaining a record that includes the date of the inspection, a descriptionof each problem identified and the date it was corrected, a description of themaintenance and repairs performed, and the name of the person whoperformed the inspection.

(e) In the event that the control devices are not operating in accordance with themanufacturer's recommendations, instructions, or operating manuals withany modifications deemed necessary by the owner or operator, the controldevices shall be expeditiously repaired or otherwise returned to operation inaccordance with such requirements. The owner or operator shall

maintaindocumentation of those periods when the control devices are not operatingin accordance with such requirements.

(f) Any documentation required under paragraphs (C)(2)(d) and (C)(2)(e) of thisrule shall be maintained for not less than five years.

(g) Any documentation required under paragraphs (C)(2)(a) to C)(2)(e) of thisrule shall be maintained at the facility and shall be made available to OhioEPA upon request.

iii. Any surface coating process with a permit-to-install issued after January 1, 1990 that identifies particulate emission limitations and control measures based on best available technology, best available control technology, or the lowest achievable emission rate shall comply with such limitations and measuresinstead of paragraphs (C)(1) and (C)(2) of this rule.

c) Operational Restrictions

(1) The permittee shall employ properly installed and maintained spray booth exhaust fan filter elements to catch paint overspray at all times the emissions unit is in operation.

(2) The permittee shall not perform any cleanup in these emissions units. Any necessary cleanup shall take place in an operation separate from these emissions units.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for the coating line:

a. The name and identification number of each coating employed.

b. The VOC content (excluding water and exempt solvents) of each coating, as applied.

c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.

d. The daily volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

Note: If the VOC content of each of the coatings employed during a day is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

(2) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were 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.

e) Reporting Requirements

The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing a daily volume-weighted average greater than 3.5pounds VOC per gallon, as applied, excluding water and exempt solvents. Thenotification shall include a copy of such record and shall be sent to the Director(appropriate District Office or local air agency) within 30 days after the exceedance occurs.

(2) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any 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 (appropriate District Office or local air agency) within 30 days after the event occurs.

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

a. any exceedances, during the previous 12 months, of the daily volume-weighted average of 3.5 lbs VOC per gallon, as applied, excluding water and exempt solvents;

b. all records, during the previous 12 months, showing that the dry filtration system was not in service when the emissions unit was in operation; and

c. any corrective action(s) taken to achieve compliance.

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. <u>Emissions Limitation</u>:

Volatile organic compound (VOC) emissions from each emissions unit shall not exceed 0.92 pound per hour and 4.0 tons per year.

<u>Applicable Compliance Method</u>:

The hourly VOC emission limitation reflects the potential to emit for the emissions unit.

The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 1.0 gallon per hour, as applied, after any final thinning, and a maximum VOC content of 0.92pound of VOC per gallon, as applied, after any final thinning.

The ton per year VOC emission limitation was developed by multiplying the emission limitation of 0.92 pound of VOC per hour by a maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds per ton.

b. Emissions Limitation:

Daily volume-weighted average of 3.5 lbs VOC per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

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

(2) In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler,

Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit-to-install and operate (PTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.