



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

3/22/2013

Matt Scroggins  
TSS Aviation  
11550 Mosteller Rd  
Cincinnati, OH 45241

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1431004457  
Permit Number: P0112547  
Permit Type: Initial Installation  
County: Hamilton

Certified Mail

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

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](http://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](http://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](http://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 Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: SWOQA



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
TSS Aviation**

Facility ID:	1431004457
Permit Number:	P0112547
Permit Type:	Initial Installation
Issued:	3/22/2013
Effective:	3/22/2013
Expiration:	3/22/2023





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
TSS Aviation

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**Final Permit-to-Install and Operate**  
 TSS Aviation  
**Permit Number:** P0112547  
**Facility ID:** 1431004457  
**Effective Date:** 3/22/2013

## Authorization

Facility ID: 1431004457  
 Application Number(s): A0046172  
 Permit Number: P0112547  
 Permit Description: Initial PTIO for three miscellaneous metal parts spray booths (K001, K002 & K003), four metal spray operations (P001, P002, P003& P004), one manual metal spray blasting booth (P005) and one plantwide solvent usage operation (P006).  
 Permit Type: Initial Installation  
 Permit Fee: \$3,600.00  
 Issue Date: 3/22/2013  
 Effective Date: 3/22/2013  
 Expiration Date: 3/22/2023  
 Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

TSS Aviation  
 11550 Mosteller Rd  
 Cincinnati, OH 45241

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

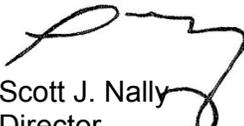
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency  
 250 William Howard Taft Rd.  
 Cincinnati, OH 45219  
 (513)946-7777

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: P0112547

Permit Description: Initial PTIO for three miscellaneous metal parts spray booths (K001, K002 & K003), four metal spray operations (P001, P002, P003 & P004), one manual metal spray blasting booth (P005) and one plantwide solvent usage operation (P006).

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

<b>Emissions Unit ID:</b>	<b>P005</b>
Company Equipment ID:	Manual Blast Booth - Metal Spray
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P006</b>
Company Equipment ID:	Plantwide Solvent Cleaning
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: Metal Spray Operations**

<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	Metal Spray 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	Metal Spray 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P003</b>
Company Equipment ID:	Metal Spray 3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	Metal Spray 4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: Miscellaneous Metal Paint Booth**

<b>Emissions Unit ID:</b>	<b>K001</b>
Company Equipment ID:	Paint Booth #1 - Crossdraft
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K002</b>
Company Equipment ID:	Paint Booth #2 - Old Downdraft
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K003</b>
Company Equipment ID:	Paint Booth #3 - New Downdraft
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
TSS Aviation  
**Permit Number:** P0112547  
**Facility ID:** 1431004457  
**Effective Date:** 3/22/2013

## **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 Southwest Ohio Air Quality Agency 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<sup>1</sup> 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.

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<sup>1</sup>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.



**Final Permit-to-Install and Operate**  
TSS Aviation  
**Permit Number:** P0112547  
**Facility ID:** 1431004457  
**Effective Date:** 3/22/2013

## **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) B.2.

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 and/or Subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants for Metal Fabrication and Finishing. Although Ohio EPA has determined that this Generally Available Control Technology (GACT) NESHAP 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>.

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.

On July 23, 2008, U.S. EPA promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Nine Metal Fabrication and Finishing Source Categories at Area Sources, 40 CFR Part 63 Subpart XXXXXX. Metal fabrication or finishing metals containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or Cadmium (Cd) must be operated in compliance with 40 CFR Part 63, Subpart XXXXXX, the national emission standards for hazardous air pollutants for metal fabrication and finishing. 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.

3. The following abbreviations are used throughout this permit.

NO<sub>x</sub> = Nitrogen Oxides

CO = Carbon Monoxide

OC = Organic Compounds

VOC = Volatile Organic Compounds



PE = Particulate matter measurable by the applicable test methods in 40 CFR Part 60, Appendix A, "Standards of Performance for New Stationary Sources"

PM10 = Particulate matter, both filterable and condensable, with an aerodynamic diameter less than or equal to a nominal ten micrometers as measured either by a reference method that is based on 40 CFR Part 50, Appendix J and designated in accordance with 40 CFR Part 53 or by an equivalent method designated in accordance with 40 CFR Part 53.

PM2.5=Particulate matter, both filterable and condensable, with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers as measured either by a reference method that is based on 40 CFR Part 50, Appendix L and designated in accordance with 40 CFR Part 53 or by an equivalent method designated in accordance with 40 CFR Part 53.

SO<sub>2</sub> = Sulfur dioxide

HAP = Hazardous Air Pollutant

TPY = Tons per year

MM = Million

CFR = Code of Federal Regulations

OAC = Ohio Administrative Code

gr/acf = grains per actual cubic foot



**Final Permit-to-Install and Operate**  
TSS Aviation  
**Permit Number:** P0112547  
**Facility ID:** 1431004457  
**Effective Date:** 3/22/2013

## **C. Emissions Unit Terms and Conditions**



**1. P005, Manual Blast Booth - Metal Spray**

**Operations, Property and/or Equipment Description:**

Manual Metal Spray Blast Booth

- 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), as effective 11/30/01	Particulate Emissions (PE), emissions of Particulate Matter 10 microns and less in diameter (PM10) and emissions of Particulate Matter 2.5 microns and less in diameter (PM2.5) shall not exceed 0.01 pound per hour and 0.04 ton per year.  See b)(2)a. and b)(2)c.  Compliance with OAC rule 3745-31-05(A)(3) includes compliance with OAC rule 3745-17-07(A)(1), 3745-17-07(B)(1) and OAC rule 3745-17-08(B).
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a three-minute average.
e.	OAC rule 3745-17-08(B)	<p>The particulate emission rate at the control device outlet shall not exceed 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas or no visible particulate emissions from the exhaust stack, whichever is less stringent.</p> <p>The permittee shall minimize or eliminate visible particulate emissions by the use of a dust collector.</p>
f.	OAC rule 3745-17-11(B)(1)	<p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC 3745-31-05(A)(3).</p> <p>If OAC rule 3745-31-05(A)(3) is rescinded, the rule based limitation of 0.551 pound of PE per hour becomes effective.</p>

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. 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 PE/PM10/PM2.5 emissions from this emissions unit since the controlled potential to emit is less than ten tons per year.



- c. The installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall meet the following requirements:
  - i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design; and
  - ii. the control equipment for this emissions unit shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions (whichever is less stringent) from the exhaust stack of this emissions unit.
  
- c) Operational Restrictions
  - (1) None.
  
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall perform daily checks, when the emissions unit is in operation and, when the weather conditions allow, for any visible particulate emissions from the exhaust stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from any points of capture and/or the stack, the permittee shall also note the following in the operations log:
    - a. the location and color of the emissions;
    - b. the total duration of any visible emissions incident; and
    - c. any corrective actions taken to eliminate the visible emissions.
  - (2) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.
  
- 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 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.



- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
  - b. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and
  - c. any corrective actions taken to eliminate the visible 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. Emission Limitation:

Particulate Emissions (PE), emissions of Particulate Matter 10 microns and less in diameter (PM10) and emissions of Particulate Matter 2.5 microns and less in diameter (PM2.5) shall not exceed 0.01 pound per hour and 0.04 ton per year.

Applicable Compliance Method:

The hourly emission limitation of 0.01 lb of PE per hour is based on the actual emissions which are calculated by: [(production rate of 100 pounds per hour) x (1% AP-42 emission factor) x (1-99% control efficiency)]. The annual PE emission rate shall be calculated by multiplying the hourly PE emission rate by the maximum operating schedule of 8760 hours/year, and dividing by 2000 pounds/ton. All PE are assumed to be PM10/PM2.5.

If required, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted when required by the Southwest Ohio Air Quality Agency.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates.
- iii. The following test method shall be employed to demonstrate compliance with the allowable mass emission rates:

Method 5 of 40 CFRPart 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



- iv. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- vi. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- vii. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

b. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule; and visible emissions from fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.



c. Emission Limitation:

The controlled emissions from the stack shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases **or** there shall be no visible emissions from the exhaust stack.

Applicable Compliance Method:

Compliance with the requirement for no visible particulate emissions from the exhaust stack, identified in this permit, shall be determined in accordance with U.S. EPA Method 22. If opting to comply with the outlet particulate emissions rate, compliance with the 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the stack shall be determined in accordance with U.S. EPA Methods 1 through 5, as appropriate.

g) Miscellaneous Requirements

- (1) None.



**2. P006, Plantwide Solvent Cleaning**

**Operations, Property and/or Equipment Description:**

Plantwide Solvent Cleaning

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.	ORC 3704.03(T)	Organic compound (OC) emissions from the plant wide solvent cleaning operation shall not exceed 33.93 tons per year based upon a rolling 12-month summation.

(2) **Additional Terms and Conditions**

a. None.

c) **Operational Restrictions**

(1) None.

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

(1) The permittee shall collect and record the following information each month:

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



- b. The volume, in gallons, of each cleanup material employed;
- c. The total volume, in gallons, of all cleanup material employed;
- d. The OC content of each cleanup material, in pounds per gallon, as applied;
- e. The total OC emission rate for all cleanup material employed, in pounds per month (b x d); and
- f. The OC emission rate summation of the past month and preceding 11 months.

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 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.

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:

Organic compound (OC) emissions from the plant wide solvent cleaning operation shall not exceed 33.93 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

The annual emission limitation of 33.93 tons of OC per year is based on the maximum hourly application rate times the maximum OC content of 6.76 pounds per gallon times 8760 hours per year, and divided by 2000 pounds per ton. Compliance shall be demonstrated based on the record keeping in d)(1).

g) Miscellaneous Requirements

- (1) None.



**3. Emissions Unit Group -Metal Spray Operations: P001,P002,P003,P004,**

EU ID	Operations, Property and/or Equipment Description
P001	Metal Spray 1
P002	Metal Spray 2
P003	Metal Spray 3
P004	Metal Spray 4

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), as effective 11/30/01	Particulate Emissions (PE), emissions of Particulate Matter 10 microns and less in diameter (PM10) and emissions of Particulate Matter 2.5 microns and less in diameter (PM2.5) shall not exceed 0.003 pound per hour and 0.013 ton per year.  See b)(2)a. and b)(2)c.  Compliance with OAC rule 3745-31-05(A)(3) includes compliance with OAC rule 3745-17-07(A)(1), 3745-17-07(B)(1) and OAC rule 3745-17-08(B).
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
d.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a three-minute average.
e.	OAC rule 3745-17-08(B)	The particulate emission rate at the control device outlet shall not exceed 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas or no visible particulate emissions from the exhaust stack, whichever is less stringent.  The permittee shall minimize or eliminate visible particulate emissions by the use of a dust collector.
f.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC 3745-31-05(A)(3).  If OAC rule 3745-31-05(A)(3) is rescinded, the rule based limitation of 0.551 pound of PE per hour becomes effective.
g.	40 CFR Part 63, Subpart HHHHHH	Exempt per 40 CFR 63.11180

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.



- b. 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 PE/PM10/PM2.5 emissions from this emissions unit since the controlled potential to emit is less than ten tons per year.

- c. The installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall meet the following requirements:
  - i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design; and
  - ii. the control equipment for this emissions unit shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions (whichever is less stringent) from the exhaust stack of this emissions unit.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and, when the weather conditions allow, for any visible particulate emissions from the exhaust stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from any points of capture and/or the stack, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. the total duration of any visible emissions incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- (2) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

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 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.

- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(1) above:
  - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
  - b. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and
  - c. any corrective actions taken to eliminate the visible 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. Emission Limitation:

Particulate Emissions (PE), emissions of Particulate Matter 10 microns and less in diameter (PM10) and emissions of Particulate Matter 2.5 microns and less in diameter (PM2.5) shall not exceed 0.003 pound per hour and 0.013 ton per year.

Applicable Compliance Method:

The hourly emission limitation of 0.003 lb of PE per hour is based on the actual emissions which are calculated by: [(production rate of 6 pounds per hour) x (1 – 50%deposit efficiency) x (1 – 90%enclosure efficiency) x (1 – 99%control efficiency)]. The annual PE emission rate shall be calculated by multiplying the hourly PE emission rate by the maximum operating schedule of 8760 hours/year, and dividing by 2000 pounds/ton. All PE are assumed to be PM10/PM2.5.

If required, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted when required by the Southwest Ohio Air Quality Agency.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates.
- iii. The following test method shall be employed to demonstrate compliance with the allowable mass emission rates:



Method 5 of 40 CFRPart 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- iv. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- vi. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- vii. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

b. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule; and visible emissions from fugitive dust shall not exceed 20 percent opacity as a three-minute average.



Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

c. Emission Limitation:

The controlled emissions from the stack shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases **or** there shall be no visible emissions from the exhaust stack.

Applicable Compliance Method:

Compliance with the requirement for no visible particulate emissions from the exhaust stack, identified in this permit, shall be determined in accordance with U.S. EPA Method 22. If opting to comply with the outlet particulate emissions rate, compliance with the 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the stack shall be determined in accordance with U.S. EPA Methods 1 through 5, as appropriate.

g) Miscellaneous Requirements

(1) None.



**4. Emissions Unit Group -Miscellaneous Metal Paint Booth: K001,K002,K003,**

EU ID	Operations, Property and/or Equipment Description
K001	Paint Booth #1 - Crossdraft
K002	Paint Booth #2 - Old Downdraft
K003	Paint Booth #3 - New Downdraft

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. d)(4), d)(5), d)(6), d)(7) and e)(2)c.

(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) 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), as effective 11/30/01	Volatile Organic Compound (VOC) emissions shall not exceed 11.81 pounds per hour and 6.27 tons per year from coatings and cleanup materials.  See b)(2)a., c)(1) and c)(2).  The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(2) and OAC rule 3745-17-11(A)(1)(i).
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-21-09(U)(2)(e)(ii)	See b)(2)c.
d.	OAC rule 3745-17-11(C)	Exempt per OAC 3745-17-11(A)(1)(i).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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; and requirements for minimizing emissions from metal fabrication and finishing.  See B.2.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. 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 controlled potential to emit is less than ten tons per year.

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

c) Operational Restrictions

(1) The VOC content for the coatings used in this emissions unit shall not exceed 6.64 pounds per gallon, as applied.

(2) The VOC content for the cleanup materials used in this emissions unit shall not exceed 6.55 pounds per gallon.



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

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

- a. the name and identification number of each coating employed;
- b. the VOC content of each coating employed, in pounds per gallon, as applied;
- c. the number of gallons of each coating employed;
- d. the total number of gallons of all the coatings employed; and
- e. the total VOC emissions from all the coatings employed, in pounds, i.e., the sum of d)(1)b. times d)(1)c. for each coating employed.

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

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

- a. the company identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material employed, in pounds per gallon;
- d. the total VOC emissions from all cleanup materials employed, in pounds, i.e., the sum of d)(2)b. times d)(2)c. for each cleanup employed;
- e. if cleanup materials are collected for off-site disposal and/or recovery, the following records shall be maintained if a credit is to be applied to the monthly VOC emissions:
  - i. the amount of cleanup material recovered during the month\* for off-site disposal and/or recovery, in gallons (or pounds, if records of recovered cleanup material is maintained by weight and VOC content in percent by weight);
  - ii. the VOC content of the recovered cleanup material shall be based on the lowest VOC content of any cleanup material collected, in pounds per gallon (or percent by weight); or it may be based upon a laboratory analyses provided by the facility to which the waste solvent is shipped;
  - iii. the date the recovered cleanup material was shipped, the amount shipped (minus the container), and the name and address of the receiving, disposal, and/or recovery facility; and
- f. the total monthly VOC emission from cleanup operations, in pounds, i.e., [d)(2)d.] – [d)(2)e.i. x d)(2)e.ii.].



\* A daily log may be required for recovered waste cleanup solvents, where a record of the monthly total volume or weight of the collected material cannot be accurately maintained. This amount shall be adjusted if the volume or weight shipped is less than the sum of the monthly recovered solvent added to the container.

- (3) The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, i.e., the sum of the daily VOC emission rates from the coating materials for the calendar year in d)(1)e. plus the sum of the monthly emissions from cleanup materials for the calendar year in d)(2)d. or d)(2)f.
- (4) The permit-to-install and operate (PTIO) application for these emissions units, K001, K002 and K003, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
  - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
    - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
    - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
  - 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., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

- 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):

Toxic Contaminant: xylene

TLV (mg/m<sup>3</sup>): 434

Maximum Hourly Emission Rate (lbs/hr): 15.60

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 1,285

MAGLC (ug/m<sup>3</sup>): 10,338

The permittee, has demonstrated that emissions of xylene, from emissions units K001, K002 and K003, is 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).

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

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "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 administrative modification 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.

- (6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", 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.
- (7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with 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.

e) Reporting Requirements

- (1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 3 gallons per day. The notification shall include a copy of such record and shall be sent to the appropriate District Office or local air agency within 45 days after the exceedance occurs.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The 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. a statement as to whether the coating operation was in compliance with each of the listed applicable rules and requirements, including the daily coating usage limitation; and whether the records of the coating and cleanup material usage demonstrated that annual emissions, as calculated in d)(3), did not exceed the ton per year VOC limit;
- b. identification of any period of time (date and number of hours) when the dry filtration system was not in service or was not operating in accordance with the manufacturer's or permittee's documented instructions during coating operations; and
- c. identification of any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the procedure in c)(2), including any additional HAPs or an increased concentration of HAPs from new coatings or cleanup materials and/or an increase in material usage.

f) **Testing Requirements**

(1) Compliance with the 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. **Emissions Limitation:**

Volatile Organic Compound (VOC) emissions shall not exceed 11.81 pounds per hour and 6.27 tons per year from coatings and cleanup materials.

**Applicable Compliance Method:**

The hourly emission limitation was calculated using the worse case application rates for painting, gun cleaning and parts washing combined as reported in PTIO application A0046172 submitted on 1/14/2013. Compliance with the annual emissions limitation shall be based upon the record keeping specified in d)(3).

b. **Usage Limitation:**

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



Applicable Compliance Method:

Compliance with the usage limitation in b)(2)c. shall be based upon the record keeping specified in d)(1)d.

c. Usage Limitation:

The VOC content for the coatings used in this emissions unit shall not exceed 6.64 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the usage limitation in c)(1) shall be based upon the record keeping specified in d)(1)b.

d. Usage Limitation:

The VOC content for the cleanup materials used in this emissions unit shall not exceed 6.55 pounds per gallon.

Applicable Compliance Method:

Compliance with the usage limitation in c)(2) shall be based upon the record keeping specified in d)(2)c.

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

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

g) Miscellaneous Requirements

(1) None.