State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

07/25/07

RE: Proposed Title V Chapter 3745-77 Permit
03-86-00-0060
BDJ Industries Inc.

Attn: Stacey Coburn AR-18J
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Coburn:

The proposed issuance of the Title V permit for BDJ Industries Inc., has been created in Ohio EPA's State Air Resources System (STARS) on 07/25/07, for review by USEPA. This proposed action is identified in STARS as 3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact me at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,

Michael W. Ahern

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

cc: Northwest District Office
File, DAPC PIER

State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 07/25/07	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 03-86-00-0060 to:
BDJ Industries Inc.
516 North Parkway
PO Box 859
West Unity, OH 43570

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

K006 (Paint Booth #6)
Coating Operation (Formerly R006)

K007 (Paint Booth #7)
Coating Operation (Formerly R007)

K008 (Paint Booth #8)
Coating Operation (Formerly R008)

K009 (Paint Booth #9)
Coating Operation (Formerly R009)

K010 (Paint Booth #10)
Coating Operation (Formerly K001)

L001 (Large Solvent Cleaner)
Cold Solvent Cleaning (Acetone)

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 352-8461

Ohio Environmental Protection Agency

_____

Chris Korleski
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter. (An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).)

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply

reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit**,** and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable

requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:

   i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

   ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

   iii. a combination of i. and ii. above.

   The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
   (Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.
(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.
(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

ii. Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.
(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

18. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

22. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

B. ***State Only Enforceable Section***

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

2. Records Retention Requirements

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

3. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. Scheduled Maintenance/Malfunction Reporting

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

5. Permit Transfers

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

6. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or

b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. There are no insignificant emissions units listed by the applicant for this facility.

B. State Only Enforceable Section

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth #6 (K006)

Activity Description: Coating Operation (Formerly R006)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint spray booth 6 - plastic and metal parts (with exhaust filters)	OAC rule 3745-31-05(A)(3) (PTI 03-11350 as modified on December 14, 2006)	60.4 lb organic compounds (OC) / day, 11.0 tons OC /yr See A.I.2.a.
	OAC rule 3745-21-09 (U)(2)(e)(iii)	The maximum daily coatings usage shall not exceeding 10 gallons of coating in any one day. See also A.I.2.a
	OAC rule 3745-31-05(C)	9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units K006, K007, K008, K009, and K010, combined (See A.I.2.b)
	OAC rule 3745-17-11(A)	See A.I.2.c.
	OAC rule 3745-17-07(A)	See A.I.2.d.
	OAC rule 3745-21-07(G)	See A.II.1

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(iii). Note: The permittee chooses to comply with the 10 gallons per day restriction of OAC 3745-21-09(U) for metal substrates, regardless of substrate coated.

2.b The emissions of HAPs from emissions units K006, K007, K008, K009, and K010, combined, shall not exceed 9.9 tons per year for an individual HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling 12-month summation of the monthly emissions. This will ensure federally enforceable emission limitations, for purposes of avoiding applicability of the Maximum Achievable Control Technology (MACT) regulations.

Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

2. Additional Terms and Conditions (continued)

2.c The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11(B)(2).

2.d This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

1. The permittee shall not employ any liquid organic material that is a photochemically reactive material for plastic coating in this emissions unit. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5). Note: The permittee chooses to comply with this restriction regardless of substrate coated. [OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping 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. documentation on whether or not each coating employed is a photochemically reactive material;

c. the volume, in gallons, of each coating employed;

d. the total volume, in gallons, of all the coatings employed;

e. the organic compound (OC) content of each coating, in lbs/gallon, as applied;

f. the OC emission rate for each coating, in lbs/day ('c' x 'e'); and

g. the total OC emission rate for all the coatings, in lbs/day (sum of 'f').
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

2. The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K006, K007, K008, K009, and K010, combined:

a. the company identification of each coating employed;

b. the amount of each individual HAP in each coating, in pounds per gallon, as applied;

c. the number of gallons of each coating employed;

d. the emission rate for each individual HAP from each coating employed ('b' x 'c') for each individual HAP, in pounds;

e. the total emission rate for each individual HAP from all the coatings employed (for each individual HAP, the summation of 'd' for all coatings), in pounds;

f. the total HAP emission rate for all HAPs combined from all the coatings employed (summation of 'e' for all HAPs for all coatings), in pounds; and

g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. all exceedances of the daily OC limit of 60.4 lbs (for this emissions unit).

b. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons and 24.9 tons, respectively (for emissions units K006, K007, K008, K009, and K010, combined).

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

2. The permittee shall notify the Director (the appropriate Ohio EPA 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. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record showing the use of non-complying materials (i.e., photochemically reactive coatings and/or cleanup materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days of the date of the daily record indicating non-compliance.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitations:
60.4 lbs OC/day
11.0 tons OC/yr

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements specified in section A.III.1 of this permit.

The annual allowable OC limitation was developed by multiplying the daily limitation by 365, and then dividing by 2000. Therefore, if compliance is shown with the daily limitation, compliance is shown with the annual limitation.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

1.b Emission Limitation:
not more than 10 gallons of coating usage per day

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements pecified in section A.III.1.d of this permit.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

1.c Emission Limitation:
9.9 tons per rolling, 12- month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units K006, K007, K008, K009, and K010, combined.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section A.III.2 of this permit.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

2. Formulation data or US EPA Method 24/311 shall be used to determine the OC/HAP content of the coatings.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint spray booth 6 - plastic and metal parts (with exhaust filters)	ORC 3704.03(F) OAC rule 3745-114-01	See Section B.IIII.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emission unit was evaluated based on the actual materials (adhesive) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the"worst case" pollutant(s):

Pollutant: acetone, isopropanol, xylene
TLV (ug/m3): 1,190,000; 983,000; 434,000
Maximum Hourly Emission Rate (lbs/hr): 5.2; 2.6; 2.6
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):
14,700; 7330; 7330
MAGLC (ug/m3): 28,300; 23,400; 10,300

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (mold release agent), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

III. Monitoring and/or Record Keeping Requirements (continued)

3. If the permittee determines that the "Air Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth #7 (K007)

Activity Description: Coating Operation (Formerly R007)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint spray booth 7 - metal parts (with exhaust filters)	OAC rule 3745-31-05(A)(3) (PTI 03-11417 as modified on November 30, 2004)	55.0 lb organic compounds (OC) / day, 10.04 tons OC /yr See A.I.2.a.
	OAC rule 3745-21-09 (U)(2)(e)(iii)	The maximum daily coatings usage shall not exceeding 10 gallons of coating in any one day.
	OAC rule 3745-31-05(A)(3)	9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units K006, K007, K008, K009, and K010, combined (See A.I.2.b)
	OAC rule 3745-17-11(A)	See A.I.2.c.
	OAC rule 3745-17-07(A)	See A.I.2.d.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(iii).

2.b The emissions of HAPs from emissions units K006, K007, K008, K009, and K010, combined, shall not exceed 9.9 tons per year for an individual HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling 12-month summation of the monthly emissions. This will ensure federally enforceable emission limitations, for purposes of avoiding applicability of the Maximum Achievable Control Technology (MACT) regulations.

Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

2.c The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11(B)(2).

2.d This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping 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 volume, in gallons, of each coating employed;

c. the total volume, in gallons, of all the coatings employed;

d. the organic compound (OC) content of each coating, in lbs/gallon, as applied;

e. the OC emission rate for each coating, in lbs/day ('b' x 'd'); and

f. the total OC emission rate for all the coatings, in lbs/day (sum of 'e').
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

2. The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K006, K007, K008, K009, and K010, combined:

a. the company identification of each coating employed;

b. the amount of each individual HAP in each coating, in pounds per gallon, as applied;

c. the number of gallons of each coating employed;

d. the emission rate for each individual HAP from each coating employed ('b' x 'c') for each individual HAP, in pounds;

e. the total emission rate for each individual HAP from all the coatings employed (for each individual HAP, the summation of 'd' for all coatings), in pounds;

f. the total HAP emission rate for all HAPs combined from all the coatings employed (summation of 'e' for all HAPs for all coatings), in pounds; and

g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. all exceedances of the daily OC limit of 55.0 lbs (for this emissions unit).

b. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons and 24.9 tons, respectively (for emissions units K006, K007, K008, K009, and K010, combined).

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

2. The permittee shall notify the Director (the appropriate Ohio EPA 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. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitations:
55.0 lbs OC/day
10.04 tons OC/yr

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements specified in section A.III.1 of this permit.

The annual allowable OC limitation was developed by multiplying the daily limitation by 365, and then dividing by 2000. Therefore, if compliance is shown with the daily limitation, compliance is shown with the annual limitation.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

1.b Emission Limitation:
not more than 10 gallons of coating usage per day

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements specified in section A.III.1.c of this permit.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

1.c Emission Limitation:
9.9 tons per rolling, 12- month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units K006, K007, K008, K009, and K010, combined.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section A.III.2 of this permit.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

2. Formulation data or US EPA Method 24/311 shall be used to determine the OC/HAP content of the coatings.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint spray booth 7 - metal parts (with exhaust filters)	ORC 3704.03(F) OAC rule 3745-114-01	See Section B.IIII.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emission unit was evaluated based on the actual materials (adhesive) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the"worst case" pollutant(s):

Pollutant: xylene *
TLV (ug/m3): 434,000
Maximum Hourly Emission Rate (lbs/hr): 3.3
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 6360
MAGLC (ug/m3): 10,300

* assumes conservatively that all organic content is xylene

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (mold release agent), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

III. Monitoring and/or Record Keeping Requirements (continued)

3. If the permittee determines that the "Air Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth #8 (K008)

Activity Description: Coating Operation (Formerly R008)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint spray booth 8 - metal parts (with exhaust filters)	OAC rule 3745-31-05(A)(3) (PTI 03-11417 as modified on November 30, 2004)	55.0 lb organic compounds (OC) / day, 10.04 tons OC /yr See A.I.2.a.
	OAC rule 3745-21-09 (U)(2)(e)(iii)	The maximum daily coatings usage shall not exceeding 10 gallons of coating in any one day.
	OAC rule 3745-31-05(A)(3)	9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units K006, K007, K008, K009, and K010, combined (See A.I.2.b)
	OAC rule 3745-17-11(A)	See A.I.2.c.
	OAC rule 3745-17-07(A)	See A.I.2.d.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(iii).

2.b The emissions of HAPs from emissions units K006, K007, K008, K009, and K010, combined, shall not exceed 9.9 tons per year for an individual HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling 12-month summation of the monthly emissions. This will ensure federally enforceable emission limitations, for purposes of avoiding applicability of the Maximum Achievable Control Technology (MACT) regulations.

Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

2.c The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11(B)(2).

2.d This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping 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 volume, in gallons, of each coating employed;

c. the total volume, in gallons, of all the coatings employed;

d. the organic compound (OC) content of each coating, in lbs/gallon, as applied;

e. the OC emission rate for each coating, in lbs/day ('b' x 'd'); and

f. the total OC emission rate for all the coatings, in lbs/day (sum of 'e').
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

2. The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K006, K007, K008, K009, and K010, combined:

a. the company identification of each coating employed;

b. the amount of each individual HAP in each coating, in pounds per gallon, as applied;

c. the number of gallons of each coating employed;

d. the emission rate for each individual HAP from each coating employed ('b' x 'c') for each individual HAP, in pounds;

e. the total emission rate for each individual HAP from all the coatings employed (for each individual HAP, the summation of 'd' for all coatings), in pounds;

f. the total HAP emission rate for all HAPs combined from all the coatings employed (summation of 'e' for all HAPs for all coatings), in pounds; and

g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. all exceedances of the daily OC limit of 55.0 lbs (for this emissions unit).

b. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons and 24.9 tons, respectively (for emissions units K006, K007, K008, K009, and K010, combined).

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

2. The permittee shall notify the Director (the appropriate Ohio EPA 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. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitations:
55.0 lbs OC/day
10.04 tons OC/yr

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements specified in section A.III.1 of this permit.

The annual allowable OC limitation was developed by multiplying the daily limitation by 365, and then dividing by 2000. Therefore, if compliance is shown with the daily limitation, compliance is shown with the annual limitation.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

1.b Emission Limitation:
not more than 10 gallons of coating usage per day

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements specified in section A.III.1.c of this permit.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

1.c Emission Limitation:
9.9 tons per rolling, 12- month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units K006, K007, K008, K009, and K010, combined.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section A.III.2 of this permit.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

2. Formulation data or US EPA Method 24/311 shall be used to determine the OC/HAP content of the coatings.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint spray booth 8 - metal parts (with exhaust filters)	ORC 3704.03(F) OAC rule 3745-114-01	See Section B.IIII.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emission unit was evaluated based on the actual materials (adhesive) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the"worst case" pollutant(s):

Pollutant: xylene *
TLV (ug/m3): 434,000
Maximum Hourly Emission Rate (lbs/hr): 3.3
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 6360
MAGLC (ug/m3): 10,300

* assumes conservatively that all organic content is xylene

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (mold release agent), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

III. Monitoring and/or Record Keeping Requirements (continued)

3. If the permittee determines that the "Air Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth #9 (K009)

Activity Description: Coating Operation (Formerly R009)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint spray booth 9 - metal parts (with exhaust filters)	OAC rule 3745-31-05(A)(3) (PTI 03-11417 as modified on November 30, 2004)	55.0 lb organic compounds (OC) / day, 10.04 tons OC /yr See A.I.2.a.
	OAC rule 3745-21-09 (U)(2)(e)(iii)	The maximum daily coatings usage shall not exceeding 10 gallons of coating in any one day.
	OAC rule 3745-31-05(A)(3)	9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units K006, K007, K008, K009, and K010, combined (See A.I.2.b)
	OAC rule 3745-17-11(A)	See A.I.2.c.
	OAC rule 3745-17-07(A)	See A.I.2.d.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(iii).

2.b The emissions of HAPs from emissions units K006, K007, K008, K009, and K010, combined, shall not exceed 9.9 tons per year for an individual HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling 12-month summation of the monthly emissions. This will ensure federally enforceable emission limitations, for purposes of avoiding applicability of the Maximum Achievable Control Technology (MACT) regulations.

Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

2.c The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11(B)(2).

2.d This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping 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 volume, in gallons, of each coating employed;

c. the total volume, in gallons, of all the coatings employed;

d. the organic compound (OC) content of each coating, in lbs/gallon, as applied;

e. the OC emission rate for each coating, in lbs/day ('b' x 'd'); and

f. the total OC emission rate for all the coatings, in lbs/day (sum of 'e').
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

2. The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K006, K007, K008, K009, and K010, combined:

a. the company identification of each coating employed;

b. the amount of each individual HAP in each coating, in pounds per gallon, as applied;

c. the number of gallons of each coating employed;

d. the emission rate for each individual HAP from each coating employed ('b' x 'c') for each individual HAP, in pounds;

e. the total emission rate for each individual HAP from all the coatings employed (for each individual HAP, the summation of 'd' for all coatings), in pounds;

f. the total HAP emission rate for all HAPs combined from all the coatings employed (summation of 'e' for all HAPs for all coatings), in pounds; and

g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. all exceedances of the daily OC limit of 55.0 lbs (for this emissions unit).

b. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons and 24.9 tons, respectively (for emissions units K006, K007, K008, K009, and K010, combined).

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

2. The permittee shall notify the Director (the appropriate Ohio EPA 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. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitations:
55.0 lbs OC/day
10.04 tons OC/yr

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements specified in section A.III.1 of this permit.

The annual allowable OC limitation was developed by multiplying the daily limitation by 365, and then dividing by 2000. Therefore, if compliance is shown with the daily limitation, compliance is shown with the annual limitation.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

1.b Emission Limitation:
not more than 10 gallons of coating usage per day

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements specified in section A.III.1.c of this permit.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

1.c Emission Limitation:
9.9 tons per rolling, 12- month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units K006, K007, K008, K009, and K010, combined.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section A.III.2 of this permit.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

2. Formulation data or US EPA Method 24/311 shall be used to determine the OC/HAP content of the coatings.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint spray booth 9 - metal parts (with exhaust filters)	ORC 3704.03(F) OAC rule 3745-114-01	See Section B.IIII.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emission units K009, K010, and L001, was evaluated based on the actual materials (adhesive) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the"worst case" pollutant(s):

Pollutant: toluene *
TLV (ug/m3): 188,000
Maximum Hourly Emission Rate (lbs/hr): 16.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 778
MAGLC (ug/m3): 4480

* All air toxic emissions assumed to be toluene which has the lowest TLV of the toxic compounds.

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (mold release agent), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

III. Monitoring and/or Record Keeping Requirements (continued)

3. If the permittee determines that the "Air Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth #10 (K010)

Activity Description: Coating Operation (Formerly K001)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint spray booth 10 - metal parts (with exhaust filters)	OAC rule 3745-31-05(A)(3) (PTI 03-11417 as modified on November 30, 2004)	50.5 lbs organic compounds (OC) / day, 9.22 tons OC /yr See A.I.2.a.
	OAC rule 3745-21-09 (U)(2)(e)(iii)	The maximum daily coatings usage shall not exceeding 10 gallons of coating in any one day.
	OAC rule 3745-31-05(A)(3)	9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units K006, K007, K008, K009, and K010, combined (See A.I.2.b)
	OAC rule 3745-17-11(A)	See A.I.2.c.
	OAC rule 3745-17-07(A)	See A.I.2.d.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(iii).

2.b The emissions of HAPs from emissions units K006, K007, K008, K009, and K010, combined, shall not exceed 9.9 tons per year for an individual HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling 12-month summation of the monthly emissions. This will ensure federally enforceable emission limitations, for purposes of avoiding applicability of the Maximum Achievable Control Technology (MACT) regulations.

Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

2.c The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11(B)(2).

2.d This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping 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 volume, in gallons, of each coating employed;

c. the total volume, in gallons, of all the coatings employed;

d. the organic compound (OC) content of each coating, in lbs/gallon, as applied;

e. the OC emission rate for each coating, in lbs/day ('b' x 'd'); and

f. the total OC emission rate for all the coatings, in lbs/day (sum of 'e').
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

2. The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K006, K007, K008, K009, and K010, combined:

a. the company identification of each coating employed;

b. the amount of each individual HAP in each coating, in pounds per gallon, as applied;

c. the number of gallons of each coating employed;

d. the emission rate for each individual HAP from each coating employed ('b' x 'c') for each individual HAP, in pounds;

e. the total emission rate for each individual HAP from all the coatings employed (for each individual HAP, the summation of 'd' for all coatings), in pounds;

f. the total HAP emission rate for all HAPs combined from all the coatings employed (summation of 'e' for all HAPs for all coatings), in pounds; and

g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. all exceedances of the daily OC limit of 50.5 lbs (for this emissions unit).

b. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons and 24.9 tons, respectively (for emissions units K006, K007, K008, K009, and K010, combined).

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

2. The permittee shall notify the Director (the appropriate Ohio EPA 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. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitations:
50.5 lbs OC/day
9.22 tons OC/yr

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements specified in section A.III.1 of this permit.

The annual allowable OC limitation was developed by multiplying the daily limitation by 365, and then dividing by 2000. Therefore, if compliance is shown with the daily limitation, compliance is shown with the annual limitation.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

1.b Emission Limitation:
not more than 10 gallons of coating usage per day

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements specified in section A.III.1.c of this permit.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

1.c Emission Limitation:
9.9 tons per rolling, 12- month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units K006, K007, K008, K009, and K010, combined.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section A.III.2 of this permit.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

2. Formulation data or US EPA Method 24/311 shall be used to determine the OC/HAP content of the coatings.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint spray booth 10 - metal parts (with exhaust filters)	ORC 3704.03(F) OAC rule 3745-114-01	See Section B.IIII.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emission units K009, K010, and L001, was evaluated based on the actual materials (adhesive) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the"worst case" pollutant(s):

Pollutant: toluene *
TLV (ug/m3): 188,000
Maximum Hourly Emission Rate (lbs/hr): 16.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 778
MAGLC (ug/m3): 4480

* All air toxic emissions assumed to be toluene which has the lowest TLV of the toxic compounds.

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (mold release agent), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

III. Monitoring and/or Record Keeping Requirements (continued)

3. If the permittee determines that the "Air Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Large Solvent Cleaner (L001)

Activity Description: Cold Solvent Cleaning (Acetone)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
solvent cold cleaner (mask washer), including solvent from facility coating clean-up operations	OAC rule 3745-31-05(A)(3) (PTI 03-13254 as modified on November 30, 2004)	21.5 ton organic compounds (OC) /y Work Practices and Control Design (See A.II.1. through A.II.4.)
	OAC rule 3745-21-09(O)	None (see A.I.2.a)

2. Additional Terms and Conditions

2.a The solvent employed in this emissions unit is acetone, which is not a volatile organic compound (VOC) as defined in OAC rule 3745-21-01. Therefore, OAC rule 3745-21-09(O) does not apply.

II. Operational Restrictions

1. The cold cleaner shall be operated with a cover, and if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute, measured at 100 degrees Fahrenheit or, if the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1)]

2. The cold cleaner shall be equipped with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1)]

3. The cold cleaner cover shall be closed at all times except when loading and unloading parts.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1)]

II. Operational Restrictions (continued)

4. The cold cleaner shall be operated an maintained in accordance with the following practices to minimize solvent evaporation from the unit:

a. provide a permanent, legible, conspicuous label, summarizing the operating requirements;

b. store waste solvent in covered containers;

c. close the cover whenever parts are not being handled in the cleaner;

d. drain the cleaned parts until dripping ceases;

e. if used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower type spray) at a pressure that does not exceed 10 pounds per square inch gauge; and

f. clean only materials that are neither porous nor absorbent.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1)]

5. The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C), or use of material formulated with Hazardous Air Pollutant(s) (HAP) as listed in or pursuant to Section 112 (b) of the Clean Air Act, in this emissions unit is prohibited.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:

a. the types of solvents employed in the cold cleaner, including the chemical name(s) and concentration;

b. the vapor pressure of each solvent applied, in pound per square inch absolute, measured at 100 degrees Fahrenheit; and

c. documentation on whether or not each solvent employed is a photochemically reactive material or contains HAP(s).
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

2. The permittee shall maintain records of the following information, collected at the end of each year:

a. the total cleaning solvent added to the cold cleaner or the amount purchased for use in the emissions unit during the year *;

b. the total amount of solvent collected for disposal and/or recovery and shipped off-site during the year; and

c. the estimated annual OC emissions from this emissions unit, calculated using the difference between the solvent used or purchased and the used solvent shipped offsite, adjusting the units to calculate the emissions in tons/year.

* Including all solvent used in facility coating clean-up operations
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports documenting any period of time in which the cold cleaner was not operated and maintained in accordance with the requirements of this permit.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

2. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any photochemically reactive material or material containing HAP(s). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

3. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emission Limitation:
21.5 tons OC/yr

Applicable Compliance Method:
Compliance shall be determined based upon the recordkeeping requirements contained in section A.III.2 of this permit.
[OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
solvent cold cleaner (mask washer), including solvent from facility coating clean-up operations	ORC 3704.03(F) OAC rule 3745-114-01	See Section B.IIII.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emission units K009, K010, and L001, was evaluated based on the actual materials (adhesive) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the"worst case" pollutant(s):

Pollutant: toluene *
TLV (ug/m3): 188,000
Maximum Hourly Emission Rate (lbs/hr): 16.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 778
MAGLC (ug/m3): 4480

* All air toxic emissions assumed to be toluene which has the lowest TLV of the toxic compounds.

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (mold release agent), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

3. If the permittee determines that the "Air Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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