



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

6/1/2010

GIULIO GABRIELE
MEGGITT AIRCRAFT BRAKING SYSTEMS CORP.
1204 MASSILLON RD.
AKRON, OH 44306-4186

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1677010999
Permit Number: P0102955
Permit Type: Renewal
County: Summit

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

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

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: ARAQMD



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
MEGGITT AIRCRAFT BRAKING SYSTEMS CORP.**

Facility ID: 1677010999
Permit Number: P0102955
Permit Type: Renewal
Issued: 6/1/2010
Effective: 6/1/2010
Expiration: 6/1/2015



Division of Air Pollution Control
Permit-to-Install and Operate
for
MEGGITT AIRCRAFT BRAKING SYSTEMS CORP.

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Authorization

Facility ID: 1677010999
Application Number(s): A0034822
Permit Number: P0102955
Permit Description: Federally Enforceable PTIO for a aircraft brake manufacturing facility consisting of Boilers, coating lines and carbon processing units.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 6/1/2010
Effective Date: 6/1/2010
Expiration Date: 6/1/2015
Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

This document constitutes issuance to:

MEGGITT AIRCRAFT BRAKING SYSTEMS CORP.
1204 MASSILLON RD.
AKRON, OH 44306

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0102955
Permit Description: Federally Enforceable PTIO for a aircraft brake manufacturing facility consisting of Boilers, coating lines and carbon processing units.

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

Emissions Unit ID: K004
Company Equipment ID: Oil Dip Tank #634
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Group Name: Boilers

Emissions Unit ID:	B001
Company Equipment ID:	Boiler #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B002
Company Equipment ID:	Boiler #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B003
Company Equipment ID:	Boiler #3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B004
Company Equipment ID:	Boiler #4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Carbon Processing Furnaces

Emissions Unit ID:	P036
Company Equipment ID:	Carbon Processing Furnace
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P037
Company Equipment ID:	Carbon Processing Furnace
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P038
Company Equipment ID:	Carbon Processing Furnace
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P039
Company Equipment ID:	Carbonization Furnace
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P041
Company Equipment ID:	Carbonization Furnace
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Spray Paint Booths

Emissions Unit ID:	K002
Company Equipment ID:	Binks Touch-up Booths
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Main Paint Shop
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K006
Company Equipment ID:	Devilbiss Spray Paint Boot w/ Despatch Oven
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K007
Company Equipment ID:	Paint Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K008
Company Equipment ID:	Binks Touch-up Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K009
Company Equipment ID:	Main Paint Shop
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K010
Company Equipment ID:	Main Paint Shop
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions

1. K004, 2 oil dipping tanks (Plant B - Dept 660)

Operations, Property and/or Equipment Description:

Spray paint booth for coating carbon disks, uses a Blue M drying oven. (Plant F-Dept. 660)

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	Facility-wide emissions shall be limited to: 20.2 TPY of hazardous air pollutants (HAP) emissions ,as a rolling, 12-month summation 9.9 TPY of any single HAP emissions, as a rolling, 12-month summation
b.	OAC rule 3745-21-09(U)(2)(e)(ii)	See A.2.a below.
c.	OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr See b)(2)c.
d.	OAC rule 3745-17-07(A)	Visible PE limitation shall not exceed 20% opacity, as a 6-minute average, except as provided by rule. See b)(2)d.
e.	OAC rule 3745-17-11(C)	See b)(2)e, c)(6), and d)(6).

(2) Additional Terms and Conditions

- a. This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

[If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09 (U)(1)(d), and the 3.0 gallons per day gallon usage restriction will no longer be applicable.]

- b. The total annual hazardous air pollutant (HAP) emissions from this facility shall not exceed 20.2 tons per year, and the individual HAP emissions rate shall not exceed 9.9 tons per year.

To ensure these limits are met, Aircraft Braking System Corporation is committing to meet the operational restrictions listed in Section B of this permit.

- c. The requirements to comply with this rule and any related terms and conditions in this permit shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.
- d. The requirements to comply with the visible PE limitation and any related terms and conditions in this permit shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions. [This emissions unit will be exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit will no longer be subject to any mass emission limitation based on OAC rule 3745-17-11.]
- e. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling of particulate emissions from surface coating processes. Paragraph (C) of OAC rule 3745-17-11, and Sections A.II.3 and A.III.4 of this permit for this emissions unit, shall be federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

c) Operational Restrictions

- (1) The permittee shall employ no more than 3.0 gallons of coating in any one day in this emissions unit.
- (2) The permittee shall operate the disposable paper filtration system when this emissions unit is in operation.
- (3) The permittee has agreed to accept limitations on annual coating usage, and HAP content to keep the facility HAP emissions below 9.9 tons per year, for any individual HAP, and total HAPs emissions below 20.2 tons per year.

The facility-wide annual coating usage shall be limited to 5,980 gallons, based upon a rolling, 365-day summation of the daily coatings usage. This restriction covers the cumulative coatings usage from the following emission units: K001, K002, K003, K006, K007, K008, K009, K010, R001, and R002, combined, calculated on a 365-day rolling summation.

- (4) Each coating employed in this emissions unit shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.
 - (5) Cleanup solvents used shall contain no hazardous air pollutants.
 - (6) Any surface coating process not exempt under paragraphs (A)(1)(h) to (A)(1)(l) of OAC rule 3745-17-11 shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each day for the coating line:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the total volume, in gallons, of all of the coatings employed,
 - d. documentation on whether or not the coating and cleanup materials employed are photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5); and
 - e. the rolling, 365-day summation of the coatings usage, in gallons.
 - (2) the permittee shall maintain a daily record of the rolling, 365-day summation of the coating usage, in gallons, on a facility-wide basis.
 - (3) The permittee shall maintain a record of whether or not the disposable paper filtration system was in service when the emissions unit was in operation.
 - (4) The permittee shall collect and record the following information each month facility-wide (for emissions units K001, K002, K003, K006, K007, K008, K009, K010, R001, and R002, combined) for the purpose of determining the annual individual HAP and combined HAPs emissions:
 - a. the name and identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the name/identification and content of each individual HAP contained in each coating, in pound of HAP per gallon of each material applied;

- d. for each individual HAP, the total emissions from all the coatings employed, in ton(s), i.e., for each individual HAP, the summation of the products of “b” times “c” for all the coatings applied during the month, divided by 2,000 pounds;
 - e. the total combined HAPs emissions from all the coatings employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from “d” above;
 - f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in “d” above, for the present month plus the previous 11 months of operation, in ton(s);
 - g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in “e” above, for the present month plus the previous 11 months of operation, in ton(s); and
 - h. documentation on whether or not any cleanup material employed contains any HAP.
- (5) The permittee shall collect and record the following information for each month for the coating operation:
- a. the company identification for each coating and cleanup material employed; and
 - b. the number of gallons of each coating and cleanup material employed.
- (6) Any surface coating process not exempt under paragraph (A)(1)(h) to (A)(1)(k) of OAC rule 3745-17-11 shall follow all of these work practices:
- a. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.
 - b. The permittee shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.
 - c. The permittee shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

- d. The permittee shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.
- e. In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.
- f. Any documentation required under paragraphs (C)(2)(d) and (C)(2)(e) of OAC rule 3745-17-11 shall be maintained for not less than five years.
- g. Any documentation required under paragraphs (C)(2)(a) to (C)(2)(e) of OAC rule 3745-17-11 shall be maintained at the facility and shall be made available to Ohio EPA upon request.

e) Reporting Requirements

- (1) 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.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the rolling, 12-month limitations for any single HAP and combined HAPs of 9.9 tons/year and 20.2 tons/year, respectively; and
 - ii. the rolling, 365-day coatings usage restriction of 5980 gallons.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(4) The annual PER shall include the following: the total coating usage, in gallons, the individual HAP emissions, in tons, and the total HAP emissions, in tons, for this emissions unit and the individual HAP emissions, in tons, and the total HAP emissions, in tons, for the entire facility for the previous calendar year

f) Testing Requirements

(1) Compliance with the emission limitations and the operational restriction in Sections A.1, A.2, and B. of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible PE shall not exceed, 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with the procedures as outlined in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

0.551 lb PE/hr

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

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

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

$TE = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used}$

$CE = \text{fractional control efficiency of the control equipment}$

If required, emission testing shall be performed in accordance with the procedures in 40 CFR Part 60, Appendix A, Methods 1- 5.

c. Operational Restriction:

use of no more than 3 gallons of coatings per day

Applicable Compliance Method:

The permittee shall demonstrate compliance with the gallon operational restriction above based on the record keeping requirements in section d) of this permit..

d. Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 5,980 gallons, based on a rolling, 365-day summation of coating usage.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the gallon usage operational restriction above based on the record keeping requirements in section d) of this permit.

e. Operational Restriction:

Coatings employed shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the gallon operational restriction above based on the record keeping requirements in section d) of this permit.

Formulation data shall be used to determine the hazardous air pollutant content of each coating employed.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group - Boilers: B001, B002, B003, B004,

EU ID	Operations, Property and/or Equipment Description
B001	50 MMBtu/hr natural gas and fuel oil fired boiler
B002	50 MMBtu/hr natural gas and fuel oil fired boiler
B003	50 MMBtu/hr natural gas and fuel oil fired boiler
B004	50 MMBtu/hr natural gas and fuel oil fired boiler

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

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

a. None.

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

a.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	See A.2.a below.
b.	When burning natural gas: OAC rule 3745-17-07(A)(1) OAC rule 3745-17-10(B)(1)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule. 0.020 pound PE per million Btu of actual heat input
c.	When burning No. 2 fuel oil: OAC rule 3745-17-07(A)(1) OAC rule 3745-17-10(B)(1)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule. 0.020 pound PE per million Btu of actual heat input

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR 52.1881(b)(59)(xix) OAC rule 3745-18-83(J)	1.10 pounds of sulfur dioxide (SO ₂) per million Btu of actual heat input. See A.2.b below.

(2) Additional Terms and Conditions

- a. The combined NO_x and SO₂ emissions from all four 50-mmBtu boilers (emissions units B001-B004, combined) at this facility shall not exceed 50.8 tons and 34.3 tons per year, respectively, based upon rolling, 12-month summations.
- b. The SO₂ emission limitation specified by this rule is less stringent than the SO₂ emission limitation established pursuant to 40 CFR 52.1881(b)(59)(xix).

c) Operational Restrictions

(1) The permittee has agreed to accept limitations on natural gas and fuel oil consumption to keep the facility NO_x emissions and SO₂ emissions below 100 tons per year. The emission limitations and fuel consumption restrictions are for the following emissions units at this facility: B001, B002, B003, and B004, combined.

- a. The annual natural gas usage for emission units B001-B004, combined, shall be limited to 720 million cubic feet per year, based upon a rolling, 12-month summation.
- b. The annual No. 2 fuel oil usage for emissions units B001-B004, combined, shall be limited to 1,500,000 gallons per year, based upon a rolling, 12-month summation.
- c. The quality of the oil burned in this emissions unit shall meet the following specifications on an as-received basis:
 - i. a sulfur content which is sufficient to comply with the allowable SO₂ emission limitation of 1.10 pounds per million Btu of actual heat input; and
 - ii. a heat content greater than 135,000 Btu per gallon of oil.
- d. The permittee shall burn only natural gas and No. 2 fuel oil as fuel in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

- a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lb/mmBtu). [The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)]. A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lb/mmBtu). [The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)].

- (2) The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.
- (3) For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (4) The permittee shall maintain monthly records which list the following information:
 - a. the total amount of natural gas and No. 2 fuel oil burned in this emissions unit;
 - b. the total amount of natural gas and No. 2 fuel oil burned in B001-B004, combined;
 - c. the total NOx emissions and SO2 emissions from B001-B004, combined;
 - d. the rolling, 12-month summations of NOx emissions and SO2 emissions from B001-B004, combined; and
 - e. the rolling, 12-month summations of natural gas and No. 2 fuel oil burned in B001-B004, combined.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports which identify any monthly record that documents an exceedance of the SO₂ emission limit of 1.10 pounds of sulfur dioxide per million Btu, along with the cause of the exceedance and an explanation of any corrective actions taken to prevent future exceedances.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The annual PER shall include the following: the amount of natural gas and No. 2 fuel oil burned in emissions units B001-B004, in gallons, the total NO_x emissions from emissions units B001-B004, in tons, the total facility-wide NO_x emissions, in tons, the total SO₂ emissions from emissions units B001-B004, in tons, the total facility-wide SO₂ emissions, in tons, for the previous calendar year, and an identification of each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit.
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the rolling, 12-month natural gas usage restriction of 720 million cubic feet;
 - ii. the rolling, 23-month No. 2 fuel oil usage restriction of 1,500,000 gallons; and
 - iii. the SO₂ emission limit of 1.10 pounds of sulfur dioxide per million Btu.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Testing Requirements

(1) Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.020 pound of PE per million Btu of actual heat input

Applicable Compliance Method:

When burning distillate fuel oil, the permittee shall demonstrate compliance with the lb PE/mmBtu limitation by multiplying the AP-42, 5th Edition, Section 1.3, Table 1.3-1 (9/98) emission factor (2 lbs PE/10³ gallon) by the maximum hourly distillate fuel oil consumption rate (370 gallons per hour), and then dividing by the maximum heat input capacity of the emissions unit (50 mmBtu per hour).

When burning natural gas, the permittee shall demonstrate compliance with the lb PE/mmBtu limitation by multiplying the AP-42, 5th Edition, Section 1.4, Table 1.4-2 (7/98) emission factor (1.9 lbs PE/mmscf) by the maximum hourly natural gas combustion rate (mmscf per hour), and then dividing by the maximum heat input capacity of the emissions unit (50 mmBtu per hour).

If required, the permittee shall demonstrate compliance with the PE lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5.

b. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the VE limitation in accordance with the procedures as outlined in OAC rule 3745-17-03(B)(1).

c. Emission Limitation:

1.10 pounds of SO₂ per million Btu of actual heat input.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the SO₂ limitation above based the record keeping requirements in section d) of this permit.

If required, the permittee shall demonstrate compliance with the SO₂ lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4 and 6.

d. Emission Limitations:

The NOx and SO2 emissions from emissions units B001-B004, combined shall not exceed 50.8 tons and 34.3 tons per year, respectively, based upon rolling, 12-month summations.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the NOx and SO2 emission limitations above based upon the record keeping requirements in section d) of this permit.

e. Emission Limitation:

The annual natural gas usage for emissions units B001-B004, combined, shall be limited to 720 million cubic feet per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the natural gas usage restriction above based upon the record keeping requirements in section d) of this permit.

f. Emission Limitations:

The annual No. 2 fuel oil usage for emissions units B001-B004, combined, shall be limited to 1,500,000 gallons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the No. 2 fuel oil usage restriction above based upon the record keeping requirements in section d) of this permit.

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group - Carbon Processing Furnaces: P036, P037, P038, P039, P040, P041, P042, P044,

EU ID	Operations, Property and/or Equipment Description
P036	11' carbon processing furnace.
P037	11' carbon processing furnace
P038	11' carbon processing furnace
P039	Carbonization Furnace
P040	Carbonization Furnace
P041	Carbonization Furnace

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

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

a. None.

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

a.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)	2.5 lbs/hr and 10.95 tpy of organic material All organic material emissions from emissions units P036 through P041 shall be vented to a thermal incinerator with at least 99 percent destruction efficiency, by weight.
b.	OAC Rule 3745-21-07(J)(2)	See A.2.a. below

- (2) Additional Terms and Conditions
 - a. The control requirements based on this applicable rule is as stringent as or less stringent than the BAT requirements established under OAC rule 3745-31-05(A).
- c) Operational Restrictions
 - (1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time, shall be equal to or greater than 1750 degrees Fahrenheit.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) In order to maintain compliance with the applicable emission limitation contained in this permit, the acceptable combustion temperature within the thermal incinerator, for any 3-hour block of time, when the emissions unit controlled by the thermal incinerator is in operation, shall not be less than 1750 degrees Fahrenheit
 - (2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
 - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal incinerator was/were in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
 - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal incinerator, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.
 - (3) Whenever the monitored average combustion temperature within the thermal incinerator deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;
 - c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and

- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the temperature readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (4) The permittee shall collect and record the following information each day:
 - a. The average temperature of the exhaust gases from the thermal incinerator during each of the eight 3-hour blocks of time during the day.
 - b. A log or record of downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit is in operation..

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

- (2) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the thermal incinerator during the 12-month reporting period for this/these emissions unit(s):
- a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal incinerator was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal incinerator;
 - c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal incinerator into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in Section A.I shall be determined in accordance with the following methods:

a. Emission Limitations:

2.5 lbs/hr of organic materials, 99 percent control efficiency

Applicable Compliance Methods:

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

- i. The emission testing shall be conducted within 6 months after permit issuance.
- ii. The emission testing shall be conducted to demonstrate compliance with the hourly organic material emission limitation and the thermal incinerator control efficiency for .
- iii. The following test method(s) shall be employed to demonstrate compliance: Methods 1 – 4 and 18, 25, and/or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule

3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- vi. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- vii. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

b. Emission Limitation:

10.95 tpy of organic materials

Applicable Compliance Method:

Compliance with the annual emission limitation shall be assumed provided that the permittee complies with the hourly emission limitation (The annual emission limitation was established by multiplying the hourly limitation by 8760, and then dividing by 2000).

g) Miscellaneous Requirements

- (1) None.

4. Emissions Unit Group - Spray Paint Booths: K001, K002, K003, K004, K006, K007, K008, K009, K010,

EU ID	Operations, Property and/or Equipment Description
K002	One spray paint booth (Plant B - Dept 656)
K003	One spray paint booth (Plant B - Dept 656)
K004	2 oil dipping tanks (Plant B - Dept 660)
K006	Spray paint booth and oven (Plant B - Dept. 626)
K007	Paint Booth. (Plant A-Dept. 675)
K008	One paint spray booth. (Plant B - Dept 656)Formerly part of K002
K009	One paint spray booth. (Plant B - Dept 656)Formerly part of K003.
K010	One paint spray booth. (Plant B - Dept 656)Formerly part of K003

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

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

a. None.

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

a.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule. See b)(2)b.
b.	OAC rule 3745-17-11(B)(1)	0.551 lb/hr of particulate matter See b)(2)a.
c.	OAC rule 3745-21-09(U)(2)(e)(ii)	See c)(1).
d.	OAC rule 3745-31-05(D)	Facility-wide hazardous air pollutant (HAP) emissions shall be limited to: 20.2 TPY combined HAPs , as a rolling,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		12-month summation 9.9 TPY of any single HAP, as a rolling, 12-month summation
e.	OAC rule 3745-17-11(C)	See b)(2)c, c)(6), and d)(5).

(2) Additional Terms and Conditions

- a. The requirements to comply with this rule and any related terms and conditions in this permit shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.
- b. The requirements to comply with the visible PE limitation and any related terms and conditions in this permit shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions. [This emissions unit will be exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit will no longer be subject to any mass emission limitation based on OAC rule 3745-17-11.]
- c. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling of particulate emissions from surface coating processes. Paragraph (C) of OAC rule 3745-17-11, and Sections A.II.3 and A.III.4 of this permit for this emissions unit, shall be federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

c) Operational Restrictions

- (1) This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09 (U)(1)(d), and the 3.0 gallons per day usage restriction will no longer be applicable.
- (2) The permittee shall operate the disposable paper filtration system when this emissions unit is in operation.
- (3) The permittee has agreed to accept limitations on annual coating usage, and HAP content to keep the facility HAP emissions below 9.9 tons per year, for any individual HAP, and below 20.2 tons per year, for combined HAP emissions.

The facility-wide annual coating usage shall be limited to 5,980 gallons, based upon a rolling, 365-day summation of the daily coatings usage. This restriction covers the cumulative coating usage from the following emission units: K001, K002, K003, K006, K007, K008, K009, K010, R001, R002 calculated on a 365-day rolling summation.

- (4) Each coating employed in this emissions unit shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.
 - (5) Cleanup solvents used shall contain no hazardous air pollutants.
 - (6) Any surface coating process not exempt under paragraphs (A)(1)(h) to (A)(1)(l) of OAC rule 3745-17-11 shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each day for the coating line:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the total volume, in gallons, of all of the coatings employed,
 - d. documentation on whether any cleanup solvent employed contained any hazardous air pollutants .
 - e. the rolling, 365-day coating usage, in gallons.
 - (2) The permittee shall maintain each day a record of the rolling, 365-day coatings usage for the entire facility.
 - (3) The permittee shall maintain a monthly record of whether or not the disposable paper filtration system was in service when the emissions unit was in operation.
 - (4) The permittee shall collect and record the following information each month for the purpose of determining HAP emissions facility-wide:
 - a. the name and identification number/code of each coating containing any HAP;
 - b. the name/identification of each individual HAP contained in each coating applied (and identified in "a" above) and the pound(s) of each HAP and combined HAPs per gallon of each HAP-containing coating applied;
 - c. the number of gallons of each coating applied during the month;
 - d. for each individual HAP, the total emissions from all the coatings employed, in ton(s), i.e., for each individual HAP, the summation of the products of "b" times "c" for all the coatings applied during the month, divided by 2,000 pounds;

- e. the total combined HAPs emissions from all the coatings employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from “d” above;
 - f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in “d” above, for the present month plus the previous 11 months of operation, in ton(s); and
 - g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in “e” above, for the present month plus the previous 11 months of operation, in ton(s).
- (5) Any surface coating process not exempt under paragraph (A)(1)(h) to (A)(1)(k) of OAC rule 3745-17-11 shall follow all of these work practices:
- a. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.
 - b. The permittee shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.
 - c. The permittee shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
 - d. The permittee shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.
 - e. In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.
 - f. Any documentation required under paragraphs (C)(2)(d) and (C)(2)(e) of OAC rule 3745-17-11 shall be maintained for not less than five years.

- g. Any documentation required under paragraphs (C)(2)(a) to (C)(2)(e) of OAC rule 3745-17-11 shall be maintained at the facility and shall be made available to Ohio EPA upon request.

e) Reporting Requirements

- (1) 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.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual permit evaluation report the following information for this emissions unit:
 - a. any record showing that the disposable paper filtration system was not in service when the emissions unit was in operation;
 - b. any monthly record showing that the coating line employed any coating with an individual HAP content of 3.34 pounds/gallon and/or total HAP content of 4.81 pounds/gallon;
 - c. any monthly record showing that the coating line employed a cleanup solvent that contains any of the 188 hazardous air pollutants.
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the rolling, 365-day facility-wide coating usage restriction of 5,980 gallons;
 - ii. the rolling, 12-month individual HAP emission limitation of 9.9 tons; and
 - iii. the rolling, 12-month combined HAPs emission limitation of 20.2 tons.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Testing Requirements

(1) Compliance with the emission limitations and the operational restriction in Sections A.1, A.2, and B. of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the Visible PE limitation above in accordance with the procedures as outlined in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

0.551 lb/hr of particulate matter

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

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

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

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

CE = fractional control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the hourly PE limitation above based on the results of emission testing conducted in accordance with the procedures in 40 CFR Part 60, Appendix A, Methods 1 - 5.

c. Operational Restriction:

use of no more than 3 gallons of coatings per day

Applicable Compliance Method:

The permittee shall demonstrate compliance with the operational restriction above based on the record keeping requirements in section d) of this permit. d.

d. Operational Restriction:

The maximum annual facility-wide coatings usage shall not exceed 5,980 gallons, based on a rolling, 365-day summation of the daily coatings usage rates..

Applicable Compliance Method:

The permittee shall demonstrate compliance with the operational restriction above based on the record keeping requirements in section d) of this permit.

e. Operational Restriction:

Coatings employed shall have a total HAP content of 4.81 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 3.34 pounds per gallon, as applied.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the operational restriction above based on the record keeping requirements in section d) of this permit.

Formulation data shall be used to determine the hazardous air pollutant content of each coating employed.

g) Miscellaneous Requirements

(1) None.