Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

6/6/2011

Certified Mail

Allen Francis
Production Paint Finishers, Inc.
140 Center Street
Bradford, OH 45308-0127

Facility ID: 0819030169
Permit Number: P0105850
County: Darke

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 3/14/2011. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Regional Air Pollution Control Agency

Response to Comments

Response to comments for: Title V Permit

Facility ID:	0819030169
Facility Name:	Production Paint Finishers, Inc.
Facility Description:	metal coating and allied services
Facility Address:	140 Center Street Bradford, OH 45308-0127 Darke County
Permit #:	P0105850, Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Greenville Daily Advocate on 04/07/2011. The comment period ended on 05/07/2011.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: **None**
    a. Comment: On Page 25 of 50 of the permit, under Section B(8) of the facility-wide terms and conditions, the list of de minimis units at the facility includes emissions unit P702 -Powder Coating Line (formerly Z002). This unit should be deleted from this list because the Powder Coating Line is part of emissions unit K001 -Miscellaneous Metal Parts Coating Line, as shown in the equipment description for K001 (page 38 of50 of the permit). This is the only powder coating line at the facility.
    b. Response: The requested change has been made. Furthermore, emissions unit P702 has been listed as an invalid emissions unit in the Ohio EPA e-business facility profile because it is a component of emissions unit K001.
2. Topic: **None**
    a. Comment: **None**
    b. Response: **None**

Ohio | Environmental Protection Agency

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Production Paint Finishers, Inc.

Facility ID:	0819030169
Permit Number:	P0105850
Permit Type:	Renewal
Issued:	6/6/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio | Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Production Paint Finishers, Inc.

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Authorization

Facility ID: 0819030169
Facility Description: metal coating and allied services
Application Number(s): A0023135, A0023136, A0023137, A0038685, A0038857, A0038865
Permit Number: P0105850
Permit Description: Title V permit renewal for a miscellaneous metal coating and allied services facility with five coating lines, natural gas-fired boiler, paint burn of oven, and two bead blasting booths
Permit Type: Renewal
Issue Date: 6/6/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0091738

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Production Paint Finishers, Inc.
140 Center Street
Bradford, OH 45308-0127

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

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. 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. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Regional Air Pollution Control Agency. 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, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. 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 C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) 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:

(1) 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 Standard Term and Condition A.2.c)(2) 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) 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))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions 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 Standard 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 Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) 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 Standard Term and Condition A.2)c)(2) 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; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) 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 section B. Facility-Wide Terms and Conditions 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 Standard Term and Condition A.2.c)(2) 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))

(4) 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))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Regional Air Pollution Control Agency.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. 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 Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. 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))

5. 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))

6. 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))

7. 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 Standard Term and Condition A.11 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. 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 when:

(1) 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; orthe 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

(2) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. 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))

8. 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))

9. 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))

10. 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 standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. 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))

12. 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))

13. 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:

(1) 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.

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

(3) 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:

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

(2) 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:

(1) 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.

(2) 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.

(3) 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))

14. 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))

15. 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))

16. 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))

17. 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))

18. 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.)

19. 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))

20. 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))

21. 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))

22. 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)

23. 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))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

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.

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.) Records Retention Requirements Under State Law Only 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.

25. 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.

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

26. 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).

27. 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.

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

28. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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 Standard Term and Condition A.2.c)(2); 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.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) 8.

2. 40 CFR Part 63, Subpart A, MACT General Provisions

   The permittee is subject to the general requirements specified in 40 CFR Part 63, Subpart A (including the table(s) and appendices referenced in Subpart A). The applicable provisions are indentified in Table 2 of 40 CFR Part 63, Subpart MMMM and Table 2 of 40 CFR Part 63, Subpart PPPP.

3. 40 CFR Part 63, Subpart MMMM, National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Metal Parts and Products Surface Coating

   Emissions Units K001, K004, K006, K007 and K008 are subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Metal Parts and Products Surface Coating (40 CFR Part 63 Subpart MMMM).

   a) The permittee shall comply with the applicable provisions of the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart MMMM.

      The final rules found in 40 CFR Part 63, Subpart MMMM establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for miscellaneous metal parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of miscellaneous metal parts and products:

all coating operations as defined in 40 CFR 63.3981;

all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

[Authority for term 40 CFR 63.3883, 40 CFR 63.3882(b), and 40 CFR 63.3940]

   b) The permittee shall comply with the applicable emissions limits, operational limits and work practices of 40 CFR Part 63, Subpart MMMM, including the following sections:

63.3890(b)(1) – Emissions Limits for Existing General Use Coating Sources	The organic hazardous air pollutant (HAP) emissions from metal parts and products coating shall be limited to no more than 0.31 kg (2.6 lbs) organic HAP per liter (gallon), during each 12-month compliance period.
63.3891 – Compliance Options	The permittee has elected to comply with the emissions limits of 63.3890(b)(1) by using compliant materials or by emission rate without add-on controls.
63.3891(a) – Compliant Material Option	Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit and that each thinner and/or other additive, and cleaning material used contains no organic HAP.
63.3891(b) – Emission Rate Without Add-on Controls	Demonstrate that based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit, calculated as a rolling 12-month emission rate and determined on a monthly basis.
63.3892(a) – Operational Limits	For any coating operation(s) using the compliant material option or the emission rate without add on controls option, the permittee is not required to meet any operating limits.
63.3893(a) - Work Practices	For any coating operation(s) using the compliant material option or the emission rate without add on controls option, the permittee is not required to meet any work practice standards.

c) The permittee shall comply with the applicable monitoring, record keeping and compliance requirements of 40 CFR Part 63, Subpart MMMM, including the following sections:

63.3900(a)(1)	General compliance requirements for compliant material option and emission rate without add-on controls
63.3930(a)	Record keeping – copies of each notification, report and supporting documentation
63.3930(b)	Record keeping – information from material suppliers and manufacturers
63.3930(c)	Record keeping – dates each compliance options was used and calculations
63.3930(d)	Record keeping – name and volume of each coating, thinner and cleaning material
63.3930(e)	Record keeping – mass fraction of organic HAP for each coating, thinner and cleaning material
63.3930(f)	Record keeping – volume fraction of solids for

	each coating used
63.3930(g)	Record keeping – density of each coating, thinner, additive and cleaning material
63.3930(h)	Record keeping – optional allowance for waste organic HAP treatment, storage or disposal
63.3930(j)	Record keeping - deviations
63.3931(a)	Records maintenance - availability
63.3931(b)	Records maintenance - duration -
63.3931(c)	Records maintenance – on-site and off-site records
63.3940	Initial compliance demonstration deadline for compliant coatings
63.3941	Initial compliance requirements for compliant coatings
63.3941(a) and 63.3951(a)	Compliance requirements – mass fraction of organic HAP
63.3941(b) and 63.3951(b)	Compliance requirements - volume fraction of coating solids
63.3941(c)	Compliance requirements – density of each coating
63.3941(d)	Compliance requirements – organic HAP content of each coating
63.3941(e)	Compliance demonstration
63.3942(a)	Continuous compliance demonstration requirements for compliant coatings
63.3942(b)	Continuous compliance requirements for compliant coatings - deviation reporting
63.3942(c)	Semiannual compliance statement for compliant coatings with no deviations
63.3942(d) and 63.3952(d)	Compliance records maintenance
63.3950	Initial compliance demonstration deadline for emission rate without add-on controls
63.3951	Initial compliance requirements for emission rate without add-on controls
63.3951(c)	Compliance requirements – density of each material
63.3951(d)	Compliance requirements – volume of each material used
63.3951(e)	Compliance requirements – calculate the mass organic HAP emissions
63.3951(f)	Compliance requirements – calculate the total volume of coating solids
63.3951(g)	Compliance requirements – calculate the organic HAP emission rate
63.3951(h)	Compliance demonstration
63.3952	Continuous compliance requirements for emission rate without add-on controls

63.3952(a)	Continuous compliance demonstration requirements for emission rate without add-on controls
63.3952(b)	Continuous compliance requirements for emission rate without add-on controls - deviation reporting
63.3952(c)	Continuous compliance requirements for emission rate without add-on controls with no deviations

d) The permittee shall comply with the applicable notification and reporting requirements of 40 CFR Part 63, Subpart MMMM, including the following sections:

63.3910(a)	General notification requirements
63.3910(b)	Initial notification requirements
63.3910(c)	Notification of compliance status
63.3920(a)	Reporting requirements – Semiannual compliance reports
63.3941(e)	Initial compliance statement for compliant coatings
63.3951(h)	Initial compliance statement for emission rate without add-on controls

4. 40 CFR Part 63, Subpart PPPP, NESHAP for Plastic Parts Surface Coating

Emissions Units K001, K004, K006, K007 and K008 are subject to the NESHAP for Plastic Parts Surface Coating.

a) The permittee shall comply with the applicable provisions of the NESHAP for Surface Coating of Plastic Parts and Products, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart PPPP.

The final rules found in 40 CFR Part 63, Subpart PPPP establish national emission standards for HAP, work practice standards, operating limitations, and compliance requirements for plastic parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of plastic parts and products:

i. all coating operations as defined in 40 CFR 63.4581;

ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee shall be subject to the requirements and limitations of this NESHAP on April 19, 2007, at which time the initial compliance period begins for the coating operations; and the initial compliance period ends on April 30, 2008.

[Authority for term 40 CFR 63.4483, 40 CFR 63.4482(b), and 40 CFR 63.4540]

b) The permittee shall comply with the applicable emissions limits operational limits and work practices of 40 CFR Part 63, Subpart PPPP, including the following sections:

63.4490(b)(1) – Emissions Limits	The organic HAP emissions from plastic parts and products coating shall not exceed 0.16 kilogram (0.16 lb) per kilogram (lb) coating solids used during each 12-month compliance period.
63.4491 – Compliance Options	The permittee has elected to comply with the emissions limits of 63.4490(b)(1) by using compliant materials or by emission rate without add-on controls.
63.4491(a) – Compliant Material Option	Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit and that each thinner and/or other additive, and cleaning material used contains no organic HAP.
63.4491(b) – Emission Rate Without Add-on Controls	Demonstrate that based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit, calculated as a rolling 12-month emission rate and determined on a monthly basis.
63.4492(a) - Operating Limits	For any coating operation(s) using the compliant material option or the emission rate without add on controls option, the permittee is not required to meet any operating limits.
63.4493(a) - Work Practices	For any coating operation(s) using the compliant material option or the emission rate without add on controls option, the permittee is not required to meet any work practice standards.

c) The permittee shall comply with the applicable monitoring, record keeping and compliance requirements of 40 CFR Part 63, Subpart PPPP, including the following sections:

63.4500(a)(1)	General compliance requirements for compliant material option and emission rate without add-on controls
63.4530(a)	Record keeping – copies of each notification, report and supporting documentation
63.4530(b)	Record keeping – information from material suppliers and manufacturers

63.4530(c)	Record keeping – dates each compliance options was used and calculations
63.4530(d)	Record keeping – name and mass of each coating, thinner and cleaning material
63.4530(e)	Record keeping – mass fraction of organic HAP for each coating, thinner and cleaning material
63.4530(f)	Record keeping – mass fraction of coating solids for each coating used
63.4530(g)	Record keeping – optional allowance for waste organic HAP treatment, storage or disposal
63.4531(a)	Records maintenance - availability
63.4531(b)	Records maintenance - duration
63.4531(c)	Records maintenance – on-site and off-site records
63.4540	Initial compliance demonstration deadline for compliant coatings
63.4541	Initial compliance requirements for compliant coatings
63.4541(a) and 63.4551(a)	Compliance requirements – mass fraction of organic HAP
63.4541(b) and 63.4551(b)	Compliance requirements - mass fraction of coating solids
63.4541(c)	Compliance requirements – organic HAP content calculations
63.4541(d)	Compliance requirements – compliance demonstration
63.4542(a)	Continuous compliance demonstration requirements for compliant coatings
63.4542(b)	Continuous compliance requirements for compliant coatings - deviation reporting
63.4542(c)	Semiannual compliance statement for compliant coatings with no deviations
63.4542(d) and 63.4552(d)	Compliance records maintenance
63.4550	Initial compliance demonstration deadline for emission rate without add-on controls
63.4551	Initial compliance requirements for emission rate without add-on controls
63.4551(c)	Compliance requirements – density of each material used
63.4551(d)	Compliance requirements – volume of each material used
63.4551(e)	Compliance requirements – calculate the mass organic HAP emissions
63.4551(f)	Compliance requirements – calculate the total mass of coating solids
63.4551(g)	Compliance requirements – calculate the organic HAP emission rate
63.4551(h)	Compliance demonstration

63.4552	Continuous compliance requirements for emission rate without add-on controls
63.4552(a)	Continuous compliance demonstration requirements for emission rate without add-on controls
63.4552(b)	Continuous compliance requirements for emission rate without add-on controls - deviation reporting
63.4552(c)	Continuous compliance requirements for emission rate without add-on controls with no deviations

d) The permittee shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart PPPP, including the following sections:

63.4510(a)	General notification requirements
63.4510(b)	Initial notification requirements
63.4510(c)	Notification of compliance status
63.4520(a)	Reporting requirements – Semiannual compliance reports
63.4541(e)	Initial compliance statement for compliant coatings
63.4551(h)	Initial compliance statement for emission rate without add-on controls

5. Predominant Surface Coating Activity Alternative Compliance Option for 40 CFR Part 63 Subpart MMMM and 40 CFR Part 63 Subpart PPPP:

   According to 40 CFR Part 63.3381(e)(2) and 40 CFR Part 63.4481(e)(2), in lieu of compliance with both 40 CFR Part 63 Subpart MMMM and 40 CFR Part 63 Subpart PPPP the permittee may comply with the emission limitation representing the predominant surface coating activity at the facility.

   Should the permittee choose the predominant surface coating activity alternative compliance option, then the permittee must determine the predominant surface coating activity at the facility in order to establish the applicable rule requirements. The predominant activity is identified as the surface coating activity that accounts for 90% or more of the permittee's coating operations.

   This determination shall be performed annually as stated in 40 CFR Part 63.3381(e)(2)(ii) of Subpart MMMM and 40 CFR Part 63.4481(e)(2)(ii) of Subpart PPPP and shall be submitted to RAPCA by January 31 of each year.

6. This facility (Emissions Unit B001) may be subject to 40 CFR Part 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial/Commercial/Institutional Boilers and Process Heaters. If subject, the permittee will be required to comply with all applicable requirements of 40 CFR Part 63, Subpart DDDDD. The permittee will also be required to comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 10

of 40 CFR Part 63, Subpart DDDDD. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart DDDDD and Subpart A.

7. The following insignificant emissions units are located at this facility.

   B001 - 10.5 MMBtu/hour, Natural Gas Fired Hot Water Boiler, PTI 08-03875
   N001 - Burn Off Oven, PTI 08-1776
   P004 - Abrasive Metal Cleaning Booth with Fabric Filter, PTI 08-04875

   Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified Permit to Install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

8. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H) or because they meet the “de minimis” criteria established in OAC rule 3745-15-05.

   B701 - Natural Gas Fired Air Make Up Units #1 and #6 (formerly Z003)
   B702 - 2.8 million BTU Natural Gas Fired Air Make Up Unit for K008
   P701 - Old abrasive metal cleaning booth with fabric filter (formerly Z001)

2.

C. Emissions Unit Terms and Conditions

1. K004, Spray Booth 4

Operations, Property and/or Equipment Description:

Paint spray booth with up to two spray guns and dry filtration that never uses more than 10 gallons of coatings per day

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1) 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 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 3745-21-09(U)(2)(e)(iii)	See b)(2)a.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Major New Source Review) (PTI P0104859)	See b)(2)b.
c.	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) shall not exceed 0.551 pounds per hour and 2.41 tons per year from coatings. See b)(2)c.
d.	OAC rule 3745-17-11(C)	See b)(2)c., c)(1) and c)(2).
e.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
f.	40 CFR Part 63, Subpart MMMM [40 CFR Part 63.3890(b)(1)]	The organic hazardous air pollutant (HAP) emissions from metal parts and products coating shall be limited to no more than 0.31 kg (2.6 lbs) organic HAP per liter (gallon), during each 12-month compliance period. See Section B.3. and B.5.

g.	40 CFR Part 63, Subpart PPPP [40 CFR Part 63.4490(b)(1)]	The organic HAP emissions from plastic parts and products coating shall not exceed 0.16 kilogram (0.16 lb) per kilogram (lb) coating solids used during each 12-month compliance period. See Section B.4. and B.5.
h.	40 CFR Part 63, Subpart A	Table 2 of 40 CFR Part 63, Subpart MMMM and Table 2 of 40 CFR Part 63, Subpart PPPP identify the applicable provisions of 40 CFR Part 63.1-15.

2) Additional Terms and Conditions

a. The permittee shall not employ more than ten gallons of coating per day in the paint spray booth.

b. The VOC emissions from this emissions unit shall not exceed 8.2 tons per year, based upon a rolling, 12-month summation of the monthly VOC emissions, based on usage.

c. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, and monitoring, record keeping, and reporting requirements contained in this permit shall become 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, at which time the requirements of OAC rule 3745-17-11(B) shall cease to apply.

c) Operational Restrictions

1) The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter system shall be employed during all periods of coating application to control particulate emissions.

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-17-11(C)]

2) The permittee shall expeditiously repair the dry particulate filter system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-17-11(C)]

d) Monitoring and/or Recordkeeping Requirements

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

b. the name and identification of each coating employed;

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

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

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-21-09(U)(2)(e)(iii)]

2) The permittee shall collect and record the following information each month for the purpose of determining the monthly and rolling 12-month VOC emissions for this emissions unit:

a. the name and identification of each coating, thinner and cleanup material employed;

b. the volume, in gallons, of each coating, thinner and cleanup material employed;

c. the VOC content for each coating, thinner and cleanup material employed, in pounds per gallon;

d. the total VOC emissions from all coatings thinners and cleanup materials employed, in tons [the summation of d)(2)b. times d)(2)c. for all coatings, thinners and clean up materials, divided by 2,000 pounds per ton]; and

e. the rolling, 12-month summation of the total VOC emissions, in tons (this shall include the information for the current month and the preceding eleven calendar months).

[Authority for term OAC rules 3745-77-07(A)(3) and PTI P0104859]

3) The permittee shall collect and record the following information each month for the purpose of determining annual organic compound (OC) emissions as required for the Title V Fee Emissions Report (FER):

a. the name and identification of each coating, thinner and cleanup material employed;

b. the OC content of each coating, thinner and cleanup material employed, in pounds per gallon;

c. the volume, in gallons, of each coating, thinner and cleanup material employed; and

d. the total OC emissions from all coatings, thinners and cleanup materials employed, in tons [the summation of d)(3)b. times d)(3)c. for all coatings, thinners and cleanup materials, divided by 2000 pounds per ton].

[Authority for term OAC rules 3745-77-07(A)(3) and PTI P0104859]

4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA or RAPCA upon request.

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-17-11(C)]

5) The permittee shall conduct periodic inspections of the dry particulate filter system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer. The permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA or RAPCA upon request.

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-17-11(C)]

6) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter system while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-17-11(C)]

7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of the person who performed the inspection.

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

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-17-11(C)]

8) The permittee shall maintain records that document any time periods when the dry particulate filter system was not in service when the emissions unit was in operation, as well as a record of all operations during which the dry particulate filter system was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA or RAPCA upon request.

   [Authority for term OAC rules 3745-77-07(A)(3) and 3745-17-11(C)]

e) Reporting Requirements

1) The permittee shall notify RAPCA in writing of any daily record showing that the coating line employs more than 10 gallons of coating per day. The notification shall include a copy of such record and shall be sent to the RAPCA within 30 days after the exceedance occurs.

   [Authority for term OAC rules 3745-77-07(A)(3) and 3745-21-09(U)]

2) The permittee shall submit quarterly deviation reports that identify all exceedances of the rolling 12-month VOC emission limitation. The quarterly deviation reports shall be submitted to RAPCA in accordance with the Standard Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

   [Authority for term OAC rules 3745-77-07(A)(3) and PTI P0104859]

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

   [Authority for term OAC rules 3745-77-07(A)(3) and PTI P0104859]

4) The permittee shall notify RAPCA in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to RAPCA within 30 days after the event occurs.

   [Authority for term OAC rules 3745-77-07(A)(3) and 3745-17-11(C)]

f) Testing Requirements

1) Compliance with the emission limitations in b)(1) and b)(2) shall be determined in accordance with the following method(s):

   a. Emission Limitation –

      The permittee shall not employ more than ten gallons of coating per day in the paint spray booth.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(1).

b. Emission Limitation –

The VOC emissions from this emissions unit shall not exceed 8.2 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(2).

c. Emission Limitation -

0.551 lb of PE per hour

Applicable Compliance Method -

To determine the worst case PE rate, the following equation shall be used:

E = maximum coating solids usage rate, in pounds per hour x (1-TE) x (1-CE)

where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

If requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

d. Emission Limitation -

2.41 tons of PE per year

Applicable Compliance Method -

Compliance with the lb/hr emission limit demonstrates compliance with this limit because this limit is based on the lb/hr limit and 8,760 hours per year of operation.

e. Emission Limitation -

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method -

If requested by the Ohio EPA, compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

[Authority for term OAC rule 3745-77-07(C)(1) and PTI P0104859]

g) Miscellaneous Requirements

1) None.

2. K007 Caulking and Sealant application

Operations, Property and/or Equipment Description:

Caulking and Sealant application throughout the facility

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1) b)(2)a. and b)(2)b.

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 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.

1	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 2.03 pounds per hour and 8.9 tons per year. See b)(2)a. .
	OAC rule 3745-31-05(A)(3)(a)(ii) (PTI P0104859)	See b)(2)b. and b)(2)c.
b.	OAC rule 3745-21-09(U)(1)(c)	See b)(2)d.
c.	OAC rule 3745-21-09(U)(1)(d)	See b)(2)e.
d.	40 CFR Part 63, Subpart MMMM [40 CFR Part 63.3890(b)(1)]	The organic hazardous air pollutant (HAP) emissions from metal parts and products coating shall be limited to no more than 0.31 kg (2.6 lbs) organic HAP per liter (gallon), during each 12-month compliance period. See Section B.3. and B.5.
e.	40 CFR Part 63, Subpart PPPP [40 CFR Part 63.4490(b)(1)]	The organic HAP emissions from plastic parts and products coating shall not exceed 0.16 kilogram (0.16 lb) per kilogram (lb) coating solids used during each 12-month compliance period. See Section B.4. and B.5.

f.	40 CFR Part 63, Subpart A	Table 2 of 40 CFR Part 63, Subpart MMMM and Table 2 of 40 CFR Part 63, Subpart PPPP identify the applicable provisions of 40 CFR Part 63. 1-15.

2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the (volatile organic compound) VOC emissions from this air contaminant source because the potential to emit for VOC of 8.90 tons per year (TPY) is less than 10.0 TPY, taking into account the federally enforceable limit of 3.5 pounds of VOC/gallon (excluding water and exempt solvents) from OAC rules 3745-21-09(U)(1)(c) and (U)(1)(d), the maximum application rate of 0.58 gallon/hour, and 8,760 hours of operation/year.

c. The coatings applied in this emissions unit consist of caulks and sealants applied manually using caulking guns. The caulks and sealants are applied throughout the facility, and the VOC emissions are not directed to any vent or stack.

d. The VOC content of each coating applied in this emissions unit that is air dried at less than 200 degrees Fahrenheit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average.

e. The VOC content of each extreme performance coating applied in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average.

c) Operational Restrictions

1) None.

d) Monitoring and/or Recordkeeping Requirements

1) The permittee, having chosen to demonstrate compliance by means of a daily volume-weighted average VOC content, shall collect and record the following information each day for the emissions unit:

a. the name and identification of each coating, as applied;

b. the mass of VOC per volume of coating (excluding water and exempt solvents) and the volume, in gallons (excluding water and exempt solvents), of each coating, as applied; and

c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$, as follows:

$$(C_{voc,2})_A = \frac{\sum_i^n C_{voc,2i}\ L_{ci}\ (V_{si} + V_{voci})}{\sum_i^n L_{ci}\ (V_{si} + V_{voci})}$$

where:

$(C_{VOC,2})_A$ = daily volume-weighted average VOC content of all coatings, as applied.

$C_{VOC,2}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents, calculated as follows:

$$C_{voc,2} = \frac{(D_c)\ (W_{voc})}{V_s + V_{voc}}$$

where:

D_C = density of coating, in pounds of coating per gallon of coating.

V_S = the volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$W_{voc} = W_{vm} - W_w - W_{ES}$$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

$$V_{voc} = V_{vm} - V_w - V_{ES}$$

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period t.

L_C = liquid volume of coating employed during time period t, in gallons of coating.

M_C = mass of coating employed during the time period t, in pounds of coating.

i = subscript denoting a specific coating employed during time period t.

n = total number of coatings employed during time period t.

t = time period specified for the weighted average VOC content.

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-21-09(U)(1)(c) and (d)]

2) The permittee shall collect and record the following records each month for the purpose of determining annual VOC emissions:

a. the name and identification of each coating employed;

b. the VOC content of each coating, in pounds of VOC per gallon of coating, as applied;

c. the volume, in gallons, of each coating applied; and

d. the total VOC emissions, in tons [the summation of d)(2)b. times d)(2)c. for all coatings employed, divided by 2,000 pounds per ton].

[Authority for term OAC rules 3745-77-07(A)(3) and PTI P0104859]

3) The permittee shall collect and record the following information each month for the purpose of determining annual organic compound (OC) emissions as required for the Title V Fee Emissions Report (FER):

a. the name and identification of each coating employed;

b. the OC content of each coating, in pounds per gallon;

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

d. the total OC emissions from all coatings employed, in tons [the summation of d)(3)b. times d)(3)c. for all coatings employed, divided by 2000 pounds per ton].

[Authority for term OAC rules 3745-77-07(A)(3) and PTI P0104859]

e) Reporting Requirements

1) The permittee shall notify RAPCA in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation of b)(2)c. and b)(2)d. The notification shall include a copy of such record and shall be sent to RAPCA within 45 days following the end of the calendar month.

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-21-09(U)(1)(c) and (d)]

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

[Authority for term OAC rules 3745-77-07(A)(3) and PTI P0104859]

f) Testing Requirements

1) Compliance with the emission limitations in b)(1) and b)(2) shall be determined in accordance with the following method(s):

a. Emission Limitation -

The VOC content of each coating applied in this emissions unit that is air dried at less than 200 degrees Fahrenheit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(1) and manufacturer coating formulation data. If requested, the VOC contents of the coatings shall be determined according to the requirements of U.S. EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

b. Emissions Limitation -

The VOC content of each extreme performance coating applied in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(1). The VOC contents of the coatings shall be determined according to the requirements of U.S. EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

[Authority for term OAC rules 3745-77-07(C)(1) and PTI P0104859]

g) Miscellaneous Requirements

1) None.

3. Emissions Unit Group - Synthetic Minor NSR Units: K001, K006, K008,

EU ID	Operations, Property and/or Equipment Description
K001	Miscellaneous Metal Parts Coating Line - consisting of overhead conveyor, multi-stage parts washer, natural gas fired dry off oven (P001), two paint booths with water wash control system, six spray guns or rotary atomizers, powder coating line, and 3.5 MMBtu/hr natural gas fired convection bake oven (P002). Coatings applied include extreme performance coatings, coatings that are air dried at less than 200 degrees Fahrenheit and zinc rich primer.
K006	Miscellaneous Metal Parts Coating Line - consisting of overhead conveyor, booth with dry filtration system, four spray guns, and 3.5 MMBtu/hr natural gas fired infrared drying oven. Coatings applied include extreme performance coatings, coatings that are air dried at less than 200 degrees Fahrenheit, and zinc rich primer.
K008	Miscellaneous Metal Parts Coating Line - with dry filtration system, coatings applied include extreme performance coatings, 12 spray guns and 2.8 MMBtu/hr input capacity natural gas-fired air makeup unit. Coatings applied include coatings that are air dried at less than 200 degrees Fahrenheit and zinc rich primer. (K008 replaced emissions unit K005.)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

1) 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(A)(3) PTI P0105733	<u>Emissions Unit K001</u>: The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 147 pounds per hour, excluding cleanup materials. The VOC emissions from this emissions unit shall not exceed 60 tons per year, including cleanup materials, based upon a rolling, 12-month summation of the monthly emissions.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Emissions Unit K006: The VOC emissions from this emissions unit shall not exceed 98.0 pounds per hour, excluding cleanup materials. The VOC emissions from this emissions unit shall not exceed 57.5 tons per year, including cleanup materials, based upon a rolling, 12-month summation of the monthly emissions. Emissions Unit K008: The VOC emissions from this emissions unit shall not exceed 84.0 pounds per hour, excluding cleanup materials. The VOC emissions from this emissions unit shall not exceed 57.5 tons per year, including cleanup materials, based upon a rolling, 12-month summation of the monthly emissions. See b)(2)a. and b)(2)c through b)(2)e. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07, 3745-17-11, 3745-21-09(U) and 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid major New Source Review (NSR)) (PTI P0105733)	See b)(2)b.
c.	OAC rule 3745-21-09(U)(1)	The emissions limitations established pursuant to this rule are less stringent than or equivalent to the emission limitations established according to OAC rule 3745-31-05(A)(3). See b)(2)c.
d.	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) from each emissions unit shall not exceed 0.551 pounds per hour and 2.41 tons per year from coatings. See b)(2)g., c)(2) and c)(3).

e.	OAC rule 3745-17-11(C)	See b)(2)g., c)(2) and c)(3).
f.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack serving these emissions units shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
g.	40 CFR Part 63, Subpart MMMM [40 CFR Part 63.3890(b)(1)]	The organic hazardous air pollutant (HAP) emissions from metal parts and products coating shall be limited to no more than 0.31 kg (2.6 lbs) organic HAP per liter (gallon), during each 12-month compliance period. See Section B.3. and B.5.
h.	40 CFR Part 63, Subpart PPPP [40 CFR Part 63.4490(b)(1)]	The organic HAP emissions from plastic parts and products coating shall be limited to no more than 0.16 kilogram (0.16 lb) per kilogram (lb) coating solids used during each 12-month compliance period. See Section B.4. and B.5.
i.	40 CFR Part 63, Subpart A	Table 2 of 40 CFR Part 63, Subpart MMMM and Table 2 of 40 CFR Part 63, Subpart PPPP identify the applicable provisions of 40 CFR Part 63. 1-15. See Section B.2.

2. Additional Terms and Conditions

a. The hourly VOC emissions limitation for each emissions unit was established for PTI purposes to reflect the potential to emit for that emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

b. In order to avoid major NSR permitting requirements, the combined VOC emissions from emissions units K001, K006 and K008 shall not exceed 120 tons per year, based upon a rolling, 12-month summation of the monthly VOC emissions, based on usage.

c. The VOC content of all the coatings applied in each of these emissions units shall not exceed 3.5 pounds of VOC per gallon, <u>excluding</u> water and exempt solvents, as a daily volume weighted average.

d. The VOC content of each of the coating materials listed in the following table shall not be exceeded regardless of the substrate being coated.

Mil-Spec Coating Material	VOC content, including water and exempt solvents (lbs/gallon)
Ultra low VOC Top Coat	0.60
Low VOC Top Coat	1.00
Low VOC Epoxy Primer	1.89

e. The use of ultra low VOC top coats shall replace the use of low VOC top coat in all applications where its use has been approved by customers.

f. A Best Available Control Technology (BACT) analysis shall be required for any future permit modifications that involve:

i. An increase in the VOC content of the Mil-Spec Coating Materials listed in b)(2)d.;

ii. An increase in the rolling 12-month VOC emissions limitation for emissions units K001, K006 and K008 combined, specified in b)(2)b.; or

iii. An increase of the individual maximum rolling 12-month VOC emissions limitations for each emissions unit K001, K006 and K008 listed in b)(1)a.

g. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, and monitoring, record keeping, and reporting requirements contained in this permit shall become 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, at which time the requirements of OAC rule 3745-17-11(B) shall cease to apply.

c) Operational Restrictions

1)` The combined VOC emissions limitation of 120 tons per year for emissions units K001, K006 and K008 established in b)(2)b is based upon a rolling 12-month summation of monthly VOC usage in the form of coatings, thinners, and cleanup materials, without emissions controls.

[Authority for term PTI P0105733]

2) The permittee shall operate and maintain the water wash control system for emissions unit K001 and the dry particulate filter systems for emissions units K006 and K008 in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The water wash control system for emissions unit K001 and the dry particulate filter systems for emissions units K006 and K008 shall be employed during all periods of coating application to control particulate emissions.

[Authority for term OAC rule 3745-17-11(C)]

3) The permittee shall expeditiously repair the water wash control system for emissions unit K001 and the dry particulate filter systems for emissions units K006 and K008 or otherwise return them to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that they are not operating in accordance with these requirements.

[Authority for term OAC rule 3745-17-11(C)]

d) Monitoring and/or Recordkeeping Requirements

1) The permittee, having chosen to demonstrate compliance by means of a daily volume-weighted average VOC content, shall collect and record the following information each day <u>for each coating line</u>:

a. the name and identification of each coating, as applied;

b. the mass of VOC per volume of coating (excluding water and exempt solvents) and the volume, in gallons, (excluding water and exempt solvents) of each coating, as applied; and

c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$, as follows:

$$(C_{voc,2})_A = \frac{\sum_i^n C_{voc,2i}\ L_{ci}\ (V_{si} + V_{voci})}{\sum_i^n L_{ci}\ (V_{si} + V_{voci})}$$

where:

$(C_{VOC,2})_A$ = daily volume-weighted average VOC content of all coatings, as applied.

$C_{VOC,2}$ = the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents, calculated as follows:

$$C_{voc,2} = \frac{(D_c)\ (W_{voc})}{V_s + V_{voc}}$$

D_C = density of coating, in pounds of coating per gallon of coating.

V_S = the volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$W_{voc} = W_{vm} - W_w - W_{ES}$$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

$$V_{voc} = V_{vm} - V_w - V_{ES}$$

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

A =subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period t.

L_C = liquid volume of coating employed during time period t, in gallons of coating.

M_C = mass of coating employed during the time period t, in pounds of coating.

i = subscript denoting a specific coating employed during time period t.

n = total number of coatings employed during time period t.

t = time period specified for the weighted average VOC content.

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-21-09(U)(1)]

2) The permittee, having chosen to demonstrate compliance for each of the mil-spec coatings in b)(2)d. through the use of compliant coatings, shall collect and record the following information each month <u>for each of the mil-spec coatings</u> employed in each line:

a. The name and identification of each coating as purchased; and

b. the mass of VOC per volume (pounds/gallon) of each coating, including water and exempt solvents, as purchased, calculated as follows for $C_{VOC,2}$:

$C_{VOC,2} = (D_C)(W_{VOC})$

where

D_C = the density of the coating, in pounds per gallon of coating.

W_{VOC} = weight fraction of VOC in coating, in pound of VOC per pound of coating.

[Authority for term PTI P0105733]

3) The permittee shall collect and record the following information each month for emissions units K001, K006 and K008 for the purposes of determining material usage and VOC emissions. This information shall be maintained separately for each emissions unit and also combined for emissions units K001, K006 and K008:

a. the name and identification of each coating, thinner and cleanup material employed;

b. the VOC content of each coating, thinner and cleanup material employed, in pounds of VOC per gallon, including water and exempt solvents;

c. the volume of each coating, thinner and cleanup material employed, in gallons, including water and exempt solvents;

d. the total VOC emissions from all coatings, thinners, and cleanup materials employed, in tons, using the following equation:

Emissions (tons/month) = $\sum_{i=1}^{n} Vj_i Gj_i /2000$

n = number of thinners, cleanup materials and coatings

Vj_i = VOC content, lbs/gallon including water and exempt solvents, for each thinner, cleanup material and coating

Gj_i = volume in gallons, including water and exempt solvents, for each thinner, cleanup material and coating; and

e. the rolling, 12-month summation of the total VOC emissions, in tons (this shall include the information for the current month and the preceding eleven calendar months).

[Authority for term OAC rule 3745-77-07(A)(3) and PTI P0105733]

4) The permittee shall collect and record the following information for the purpose of determining annual organic compound (OC) emissions as required for the Title V Fee Emissions Report (FER). This information shall be maintained separately for each emissions unit.

a. the name and identification of each coating, thinner, and cleanup material employed;

b. the OC content of each coating, thinner, and cleanup material employed, in pounds per gallon;

c. the volume, in gallons, of each coating, thinner, and cleanup material employed; and

d. the total OC emissions from all coatings, thinners, and cleanup materials employed, in tons, using the following equation:

Emissions (tons/year) = $\sum_{i=1}^{n} Vj_i Gj_i / 2000$

n = number of thinners, cleanup materials and coatings

Vj_i = OC content, in lbs/gallon, for each thinner, cleanup material and coating

Gj_i = volume, in gallons, for each thinner, cleanup material and coating

[Authority for term OAC rule 3745-77-07(A)(3) and PTI P0105733]

5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the water wash control system for emissions unit K001 and for the dry particulate filter systems for emissions units K006 and K008, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA or RAPCA upon request.

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-17-11(C)]

6) The permittee shall conduct periodic inspections of the water wash control system for emissions unit K001 and the dry particulate filter systems for emissions units K006 and K008 to determine whether they are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA or RAPCA upon request.

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-17-11(C)]

7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the water wash control system for emissions unit K001 and the dry particulate filter systems for emissions units K006 and K008 while the emissions units are shut down and perform any needed maintenance and repair to ensure that they are operated in accordance with the manufacturer's recommendations.

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-17-11(C)

8) The permittee shall document each inspection (periodic and annual) of the water wash control system for emissions unit K001 and the dry particulate filter systems for emissions units K006 and K008 and shall maintain the following information:

a. the date of each inspection;

b. a description of each problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of the person who performed the inspection.

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

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-17-11(C)]

9) The permittee shall maintain records that document any time periods when the water wash control system for emissions unit K001 and the dry particulate filter systems for emissions units K006 and K008 were not in service when the emissions units were in operation, as well as, a record of all operations during which the water wash control system and the dry particulate filter systems were not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA or RAPCA upon request.

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-17-11(C)]

e) Reporting Requirements

1) The permittee shall notify RAPCA in writing of each daily record showing a daily volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to RAPCA within 30 days after the event occurs.

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-21-09(U)(1)]

2) The permittee shall notify RAPCA in writing of any monthly record showing the use of non-complying coatings that exceed the VOC content limitations specified in b)(2)d. The notification shall include a copy of such record and shall be sent to RAPCA within 30 days following the end of the calendar month.

[Authority for term PTI P0105733]

3) The permittee shall submit quarterly deviation reports that identify:

a. all exceedances of the individual rolling 12-month VOC emission limitations for K001, K006 and K008 in b)(1)a.; and

b. all exceedances of the combined rolling, 12-month VOC emission limitation for K001, K006 and K008 in b)(2)b.

The quarterly deviation reports shall be submitted to RAPCA in accordance with the Standard Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

[Authority for term OAC rule 3745-77-07(A)(3) and PTI P0105733]

4) The permittee shall submit annual reports for each calendar year that specify:

a. the name and identification of each coating, thinner, and cleanup material employed;

b. the total VOC emissions from emissions units K001, K006 and K008 individually;

c. the total VOC emissions from emissions units K001, K006 and K008 combined;

d. the total OC emissions from emissions units K001, K006 and K008 individually; and

e. the total OC emissions from emissions units K001, K006 and K008 combined.

The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied, in part, by including and identifying the specific emission data for these emissions units in the annual FER.

[Authority for term OAC rule 3745-77-07(A)(3) and PTI P0105733]

5) The permittee shall notify RAPCA in writing of any record showing that the dry filtration systems or water wash control system were not in service when emissions units K001, K006 and K008 were in operation. The notification shall include a copy of such record and shall be sent to RAPCA within 30 days after the event occurs.

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-17-11(C)]

f) Testing Requirements

1) Compliance with the emission limitations in b)(1) and b)(2) and operational restrictions in c)(1) shall be determined in accordance with the following method(s):

a. Emission Limitation –

The VOC emissions from emissions unit K001 shall not exceed 147 pounds per hour, excluding cleanup materials.

Applicable Compliance Method –

This emissions limitation is the potential to emit for this emissions unit and was based upon the maximum application rate of 7 gallons/hour/spray gun, 6 spray guns, and compliance with b)(2)c. (3.5 lbs of VOC/gallon, excluding water and exempt solvents, as a daily volume weighted average).

b. Emission Limitation –

The VOC emissions from emissions unit K001 shall not exceed 60 tons per year, including cleanup materials, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(3) and shall be the sum of the VOC emissions for the previous 12-months.

c. Emission Limitation –

The VOC emissions from emissions unit K006 shall not exceed 98.0 pounds per hour, excluding cleanup materials.

Applicable Compliance Method –

This emissions limitation is the potential to emit for this emissions unit and was based upon the maximum application rate of 7 gallons/hour/spray gun, 4 spray guns, and compliance with b)(2)c. (3.5 lbs of VOC/gallon, excluding water and exempt solvents, as a daily volume weighted average).

d. Emission Limitation –

The VOC emissions from emissions unit K006 shall not exceed 57.5 tons per year, including cleanup materials, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(3) and shall be the sum of the VOC emissions for the previous 12-months.

e. Emission Limitation –

The VOC emissions from emissions unit K008 shall not exceed 84.0 pounds per hour, excluding cleanup materials.

Applicable Compliance Method –

This emissions limitation is the potential to emit for this emissions unit and was based upon the maximum application rate of 2 gallons/hour/spray gun, 12 spray guns, and compliance with b)(2)c. (3.5 lbs of VOC/gallon, excluding water and exempt solvents, as a daily volume weighted average).

f. Emission Limitation –

The VOC emissions from emissions unit K006 shall not exceed 57.5 tons per year, including cleanup materials, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(3) and shall be the sum of the VOC emissions for the previous 12-months.

g. Emission Limitation –

The combined VOC emissions from emissions units K001, K006 and K008 shall not exceed 120 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(2) and shall be the sum of the VOC emissions for the previous 12-months.

h. Emissions Limitation –

The VOC contents of the coating materials listed in the following table shall not be exceeded regardless of the substrate being coated.

Mil Spec Coating Material	VOC content, including water and exempt solvents (lbs/gallon)
Ultra low VOC Top Coat	0.60
Low VOC Top Coat	1.00
Low VOC Epoxy Primer	1.89

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(2) and manufacturer coating formulation data. If requested, the VOC content shall be determined according to the requirements of U.S. EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

i. Emission Limitation –

The VOC content of all coatings applied in each emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, <u>excluding</u> water and exempt solvents, as a daily volume-weighted average.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(1) and manufacturer coating formulation data. If requested, the VOC content shall be determined according to the requirements of U.S. EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

j. Emission Limitation -

0.551 lb of PE per hour

Applicable Compliance Method -

To determine the worst case PE rate, the following equation shall be used:

E = maximum coating solids usage rate, in pounds per hour, x (1-TE) x (1-CE)

where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

If requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

k. Emission Limitation -

2.41 tons of PE per year

Applicable Compliance Method -

Compliance with the lb/hr emission limit demonstrates compliance with this limit because this limit is based on the lb/hr limit and 8,760 hours per year of operation.

l. Emission Limitation -

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method -

If requested by the Ohio EPA, compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

[Authority for term OAC rule 3745-77-07(C)(1) and PTI P0105733]

g) Miscellaneous Requirements

1) None.