



Environmental
Protection Agency

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

10/17/2011

KEVIN RESER
NATIONAL MACHINERY LLC
161 GREENFIELD ST
TIFFIN, OH 44883

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0374020062
Permit Number: P0087723
Permit Type: Renewal
County: Seneca

Certified Mail

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

Dear Permit Holder:

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

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

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

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-NWDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
NATIONAL MACHINERY LLC**

Facility ID:	0374020062
Permit Number:	P0087723
Permit Type:	Renewal
Issued:	10/17/2011
Effective:	10/17/2011
Expiration:	8/16/2021



Division of Air Pollution Control
Permit-to-Install and Operate
for
NATIONAL MACHINERY LLC

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them?..... 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6
13. Can I transfer this permit to a new owner or operator?..... 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7
15. What happens if a portion of this permit is determined to be invalid? 7
B. Facility-Wide Terms and Conditions..... 8
C. Emissions Unit Terms and Conditions 10
1. B001, Boiler 2 11
2. B002, Boiler 1 14
3. K001, misc. metal parts spray booth with dry filtration..... 18

Authorization

Facility ID: 0374020062
Application Number(s): A0018770, A0018771, A0042791
Permit Number: P0087723
Permit Description: Renewal PTIO for B001, B002, and K001
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 10/17/2011
Effective Date: 10/17/2011
Expiration Date: 8/16/2021
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

NATIONAL MACHINERY LLC
GREENFIELD ST
TIFFIN, OH 44883

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

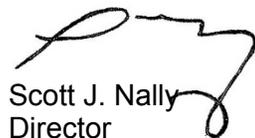
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director

Authorization (continued)

Permit Number: P0087723
Permit Description: Renewal PTIO for B001, B002, and K001

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

Emissions Unit ID:	B001
Company Equipment ID:	Boiler 2
Superseded Permit Number:	P0029976
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B002
Company Equipment ID:	Boiler 1
Superseded Permit Number:	P0029977
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K001
Company Equipment ID:	K001
Superseded Permit Number:	03-16106
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

C. Emissions Unit Terms and Conditions



1. B001, Boiler 2

Operations, Property and/or Equipment Description:

30 mmBtu/hour natural gas-fired boiler

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-10(B)(1)	0.020 pound particulate emissions (PE)/mmBtu
b.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, except as provided by rule.
c.	OAC rule 3745-18-80(F)	1.2 pounds sulfur dioxide (SO ₂)/mmBtu [See b)(2)a]

(2) Additional Terms and Conditions

a. Natural gas combustion is the only source of SO₂ emissions from this emissions unit. The potential to emit of SO₂ from this emissions unit is negligible (0.08 ton/year) and was calculated as follows:

30 mmBtu ⁽¹⁾ hour	0.6 pound SO ₂ ⁽²⁾ 10 ⁶ scf	1 pound 10 ⁶ scf ⁽³⁾ 1,020 lbs mmBtu	8,760 hours ⁽⁴⁾ year	1 ton ⁽³⁾ 2,000 pounds
---------------------------------	---	---	------------------------------------	--------------------------------------

Where:

- (1) Maximum input capacity.
- (2) AP-42 Chapter 1.4 (7/98) emission factor.
- (3) Conversion factors.
- (4) Maximum annual operating schedule.

- b. In accordance with Ohio EPA's Engineering Guide #61 (revised 9/5/1996), this facility is presumed to have inherent physical limitations since the facility's actual emissions are below twenty percent (20%) of any major regulated pollutant threshold. As a result, this facility is not required to obtain a Title V permit or a federally enforceable state operating permit (FESOP) to limit the facility's potential to emit in order to avoid Title V permitting thresholds.

Pursuant to Engineering Guide #61, if an entity avoiding Title V permitting is taking advantage of this presumption, and in a future year the regulated pollutant emissions exceed the twenty percent (20%) threshold, then the entity will have one year to obtain a FESOP or submit a complete Title V permit application.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:
0.020 pound PE/mmBtu

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated in accordance with OAC rule 3745-17-03(B)(9).

b. Emission Limitation:

Visible emissions shall not exceed 20% opacity as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated in accordance with OAC rule 3745-17-03(B)(1).

c. Emission Limitation:

1.2 pounds SO₂/mmBtu

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated in accordance with OAC rule 3745-18-04(A).

g) Miscellaneous Requirements

(1) None.



2. B002, Boiler 1

Operations, Property and/or Equipment Description:

60 mmBtu/hr natural gas and #6 fuel oil-fired boiler

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	The sulfur content of the #6 fuel oil shall not exceed 1%, by weight [See c)(2)].
b.	OAC rule 3745-17-10(C)(1)	0.23 pound particulate emissions (PE)/mmBtu
c.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, except as provided by rule.
d.	OAC rule 3745-18-80(F)	1.2 pounds sulfur dioxide (SO ₂)/mmBtu [See b)(2)a]

(2) Additional Terms and Conditions

a. The emission limitation established pursuant to this rule is greater than the potential to emit of SO₂ from this emissions unit.

The facility combusts natural gas or #6 fuel oil in this emissions unit.

i. The potential to emit of SO₂ from natural gas combustion is negligible (0.16 ton/year) and was calculated as follows:



60 mmBtu ⁽¹⁾ hour	0.6 pound SO ₂ ⁽²⁾ 10 ⁶ scf	1 pound 10 ⁶ scf ⁽³⁾ 1,020 lbs mmBtu	8,760 hours ⁽⁴⁾ year	1 ton ⁽³⁾ 2,000 pounds
---------------------------------	---	---	------------------------------------	--------------------------------------

Where:

- (1) Maximum input capacity.
- (2) AP-42 Chapter 1.4 (7/98) emission factor.
- (3) Conversion factors.
- (4) Maximum annual operating schedule.

ii. The potential to emit of SO₂ from #6 fuel oil combustion is 134.09 tons/year and was calculated as follows:

157*S lbs SO ₂ ⁽¹⁾ 10 ³ gallons	1% ⁽²⁾	195 gallons ⁽³⁾ hour	8,760 hours ⁽⁴⁾ year	1 ton ⁽⁵⁾ 2,000 pounds
---	-------------------	------------------------------------	------------------------------------	--------------------------------------

Where:

- (1) AP-42 Chapter 1.3 (5/10) emission factor.
- (2) Maximum sulfur content.
- (3) Maximum hourly gallon usage rate.
- (4) Maximum annual operating schedule.
- (5) Conversion factors.

b. In accordance with Ohio EPA's Engineering Guide #61 (revised 9/5/1996), this facility is presumed to have inherent physical limitations since the facility's actual emissions are below twenty percent (20%) of any major regulated pollutant threshold. As a result, this facility is not required to obtain a Title V permit or a federally enforceable state operating permit (FESOP) to limit the facility's potential to emit in order to avoid Title V permitting thresholds.

Pursuant to Engineering Guide #61, if an entity avoiding Title V permitting is taking advantage of this presumption, and in a future year the regulated pollutant emissions exceed the twenty percent (20%) threshold, then the entity will have one year to obtain a FESOP or submit a complete Title V permit application.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas or #6 fuel oil in this emissions unit.
- (2) The sulfur content of the #6 fuel oil shall not exceed 1 percent (1%), by weight.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas or #6 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

- (2) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the fuel oil type (number 2, 4, or 6), the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in pounds/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

- (3) In lieu of the requirements specified in d)(2) for the sulfur content of #6 fuel oil, the permittee may maintain fuel oil certification records from the supplier for each shipment of oil. The records from the supplier shall include the following information:
- a. the name of the oil supplier; and
 - b. the sulfur content of the oil shipment.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:
0.020 pound PE/mmBtu
- Applicable Compliance Method:
If required, compliance with this emission limitation shall be demonstrated in accordance with OAC rule 3745-17-03(B)(9).

- b. Emission Limitation:
Visible emissions shall not exceed 20% opacity as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated in accordance with OAC rule 3745-17-03(B)(1).

- c. Emission Limitation:
1.2 pounds SO₂/mmBtu

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated in accordance with OAC rule 3745-18-04(A).

g) Miscellaneous Requirements

- (1) None.



3. K001, misc. metal parts spray booth with dry filtration

Operations, Property and/or Equipment Description:

miscellaneous metal parts spray booth with dry filtration

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

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

a. b)(1)d. and d)(3) through d)(5)

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Rows include details for OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(U), OAC rule 3745-17-11(C), and OAC rule 3745-114-01 ORC 3704.03(F).

- (2) Additional Terms and Conditions
- a. For the purpose of federal enforceability, OC emissions will effectively restrict volatile organic compounds (VOC) emissions.
 - b. This emissions unit is exempt from the compliant coating requirements of OAC rule 3745-21-09(U)(1) provided coating material usage never exceeds 10 gallons in any one day. If coating material usage exceeds 10 gallons in any one day, the emissions unit will no longer qualify for the exemption in OAC rule 3745-21-09(U)(2)(e)(iii) and the permittee will be required to comply with the requirements of OAC rule 3745-21-09(U)(1). The requirements of OAC rule 3745-21-09(U)(1) will become applicable to this emissions unit on the day coating usage exceeds 10 gallons and will continue to be applicable even on following days where coating material usage is less than 10 gallons.
 - c. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.
- c) Operational Restrictions
- (1) The permittee shall install, operate, and maintain dry particulate filter system(s) for the surface coating operation(s) 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(s) shall be employed during all periods of coating application to control particulate emissions.
 - (2) The permittee shall expeditiously repair the dry particulate filter(s) 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(s) is/are not operating in accordance with these requirements.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating and reducer/thinner employed;
 - b. the volume, in gallons, of each coating and reducer/thinner employed; and
 - c. the total volume, in gallons, of all coatings and reducers/thinners employed [sum of d)(1)b.].
 - (2) The permittee shall collect and record the following information on a monthly basis for this emissions unit:
 - a. the name and identification of each coating, reducer/thinner, and cleanup material employed;
 - b. the number of gallons of each coating, reducer/thinner, and cleanup material employed;

- c. the OC content of each coating, reducer/thinner, and cleanup material employed, in pounds per gallon;
 - d. the OC emissions from each coating material employed, in pounds [d)(2)b. x d)(2)c., for each coating employed];
 - e. the OC emissions from each reducer/thinner employed, in pounds [d)(2)b. x d)(2)c., for each reducer/thinner employed];
 - f. the OC emissions from each cleanup material employed in pounds [d)(2)b. x d)(2)c., for each cleanup material employed];
 - g. the total OC emissions from all coatings employed, in tons [sum of d)(2)d. divided by 2,000 lbs/ton];
 - h. the total OC emissions from all reducers/thinners employed, in tons [sum of d)(2)e. divided by 2,000 lbs/ton];
 - i. the total OC emissions from all cleanup materials employed, in tons [sum of d)(2)f. divided by 2,000 lbs/ton];
 - j. the annual year-to-date OC emissions, in tons, from all coatings and reducers/thinners employed [summation of d)(2)g. + d)(2)h. for each calendar month-to-date from January to December]; and
 - k. the annual year-to-date OC emissions, in tons, from all cleanup materials employed [summation of d)(2)i. for each calendar month-to-date from January to December].
- (3) The permit to install for emissions unit K001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by the emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: 2-Butoxyethanol
TLV (mg/m³): 96.7
Maximum Hourly Emission Rate (lbs/hr): 6.71
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 204.1
MAGLC (µg/m³): 2,302.4
- (4) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines

that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (5) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- (6) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for each dry particulate filter, 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 appropriate Ohio EPA District Office or local air agency upon request.
- (7) The permittee shall conduct periodic inspections of each dry particulate filter 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 and the

permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

- (8) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of each dry particulate filter 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.
- (9) The permittee shall document each inspection (periodic and annual) of each dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of 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 appropriate Ohio EPA District Office or local air agency upon request.

- (10) The permittee shall maintain records that document any time periods when the dry particulate filter(s) was/were not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- e) Reporting Requirements
- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
 - (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
 - (3) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 10 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation: coating operation
62.60 pounds OC/day

Applicable Compliance Method:

The daily emission limitation is based on a maximum, combined coating/thinner usage rate of 10 gallons per day, as follows:

5 gallons ⁽¹⁾ day	5.82 lbs VOC ⁽²⁾ gallon	+	5 gallons ⁽³⁾ day	6.71 lbs VOC ⁽⁴⁾ gallon
---------------------------------	---------------------------------------	---	---------------------------------	---------------------------------------

Where:

- (1) Maximum coating usage rate.
- (2) Maximum VOC content of coating.
- (3) Maximum thinner usage rate.
- (4) Maximum VOC content of thinner.

Therefore provided compliance is demonstrated with the daily coating usage rate [See d)(1)], compliance with the daily emission limitation shall also be demonstrated.

b. Emission Limitation: coating operation
11.42 tons OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the record keeping requirements specified in section d)(2) of this permit.

c. Emission Limitations: cleanup operation
33.50 pounds OC/month and 0.18 ton OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with these emission limitations in accordance with the record keeping requirements specified in section d)(2) of this permit.

d. Emission Limitation:
Maximum coating usage rate of 10 gallons/day.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the record keeping requirements specified in section d)(1) of this permit.

- g) Miscellaneous Requirements
 - (1) None.